

Historic, archived document

Do not assume content reflects current scientific knowledge, policies, or practices.



United States
Department of
Agriculture

Forest Service

Tongass National Forest

R10-MB-519c

December 2004



Shoreline Outfitter/Guide

Record of Decision and Final Environmental Impact Statement

Volume III: FEIS (Appendices)



The United States Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD).

To file a complaint of discrimination, write U.S. Department of Agriculture, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue SW, Washington, DC 20250-9410, or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.



Federal Recycling Program
Printed on Recycled Paper

Contents

Volume III: FEIS (Appendices)

Appendix A—Use Area Cards	A-1
Appendix B—Large Group Area Cards	B-1
Appendix C—Mitigation	C-1
Appendix D—Monitoring	D-1
Appendix E—Management Direction	E-1
Appendix F—Recreation Management Concepts	F-1
Appendix G—Response to Comments on the Shoreline Outfitter/Guide Draft EIS	G-1

List of Tables

Appendix A—Use Area Cards

Table A-1. List of Use Areas.....	A-1
-----------------------------------	-----

Appendix B—Large Group Area Cards

Table B-1. List of Large Group Areas: Enclaves	B-1
Table B-2. List of Large Group Areas: Fifteen Percent Areas	B-2
Table B-3. Large Group Areas Considered but Eliminated.....	B-104

Appendix C—Mitigation Measures

Table C-1. ROS Guidelines for Group Encounters and Group Size for Wild and Scenic Rivers	C-13
---	------

Appendix E—Management Direction

Table E-1. Area (Acres) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area.....	E-12
Table E-2. Length (Miles) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area.....	E-14

Appendix F—Recreation Management Concepts

Table F-1. Forest Plan ROS Classification by Land Use Designation (LUD)	F-3
Table F-2. Forest Plan Standards and Guidelines for ROS Classifications.....	F-4
Table F-3. Dates and Number of Days of Seasonal Use	F-14

Contents—Volume III

List of Figures

Appendix A—Use Area Cards

Figure A-1. Shoreline Outfitter/Guide FEIS Analysis Area..... A-3

Appendix B—Large Group Area Cards

Figure B-1. Vicinity Map Shoreline Outfitter/Guide FEIS Analysis AreaB-3

Appendix A

Use Area Cards

Appendix A

Use Area Cards

Use Areas are geographic areas used in this analysis as the basis for defining and managing recreation use. Use Areas provide distinct geographical areas at a size that allows meaningful recreation management for specific areas of the national forest.

The following Use Area cards are used to provide site-specific information and resource considerations relating to commercial recreation management for each Use Area. They support the information provided in Chapters 2 and 3. The seasonal allocations and specific measures are displayed for each alternative. Most resource concerns are mitigated through measures listed in Appendix C, which apply to guided recreation use across the entire analysis area. Resource concerns specific to each Use Area are listed on the Use Area Card and in Appendix C. Figure A-1 displays the general location of the Use Areas.

The information on these cards will be used to prepare and administer outfitter/guide permits. The mitigation measures will be incorporated into the document as permit stipulations where applicable. The permit conditions will be enforced through permit administration.

Table A-1. List of Use Areas

Use Area	General Location	Use Area	General Location
01-01	Skagway Area	04-04C	Baranof Warm Springs
01-02	Haines Area	04-05	SW Admiralty
01-03	East Chilkats	04-06A	Pybus Bay
01-04A	Berners Bay	04-06B	Eliza Harbor
01-04B	N. Juneau Coast	04-07	Gambier Bay
01-04C	Taku Inlet	04-08	NE Admiralty
01-04D	Slocum Inlet	04-09	Seymour Canal
01-05A	Taku Harbor	04-10A	Greens Creek
01-05B	Port Snettisham	04-10B	NW Admiralty
01-05C	Windham Bay	04-11	Hoonah Area
01-05D	Tracy Arm	04-12	Tenakee Inlet
01-05E	Fords Terror	04-13	Peril Strait
04-01A	Gut Bay, Baranof	04-14	Slocum Arm
04-01B	Port Armstrong	04-15	West Chichagof
04-02A	Redoubt Lake	04-16A	Point Adolphus
04-02B	Whale Bay	04-16B	Mud Bay
04-03	Sitka Area	04-16C	Idaho Inlet
04-04A	Lake Eva, Rodman Bay	04-16D	Port Althorp
04-04B	Kelp Bay		

Appendix A—Use Area Cards



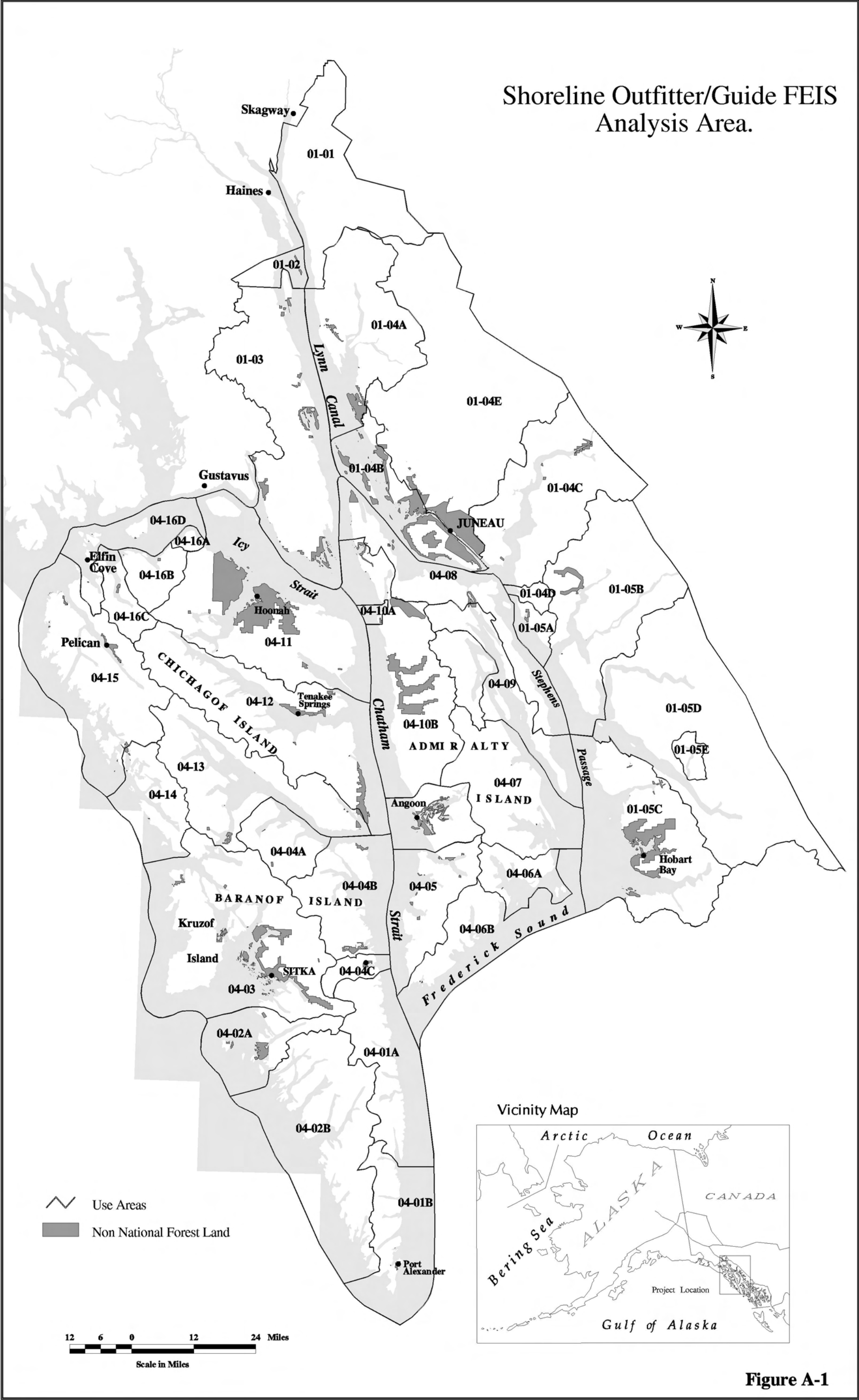


Figure A-1

Use Area 01-01

Skagway Area – Juneau Ranger District

Recreation Carrying Capacity (total capacity for all users)			
Groups at one time	Spring	Summer	Fall
10	420	1,060	470
Description This use area extends from the Skagway area south to, but does not include, Sullivan Island within eastern Lynn Canal. The area is characterized by steep, rocky and often inaccessible shoreline. A notable exception is the Katzeihin River area, which is the focus of both commercial and non-commercial activity. The upper 10 miles of the 12-mile Katzeihin River has been recommended for Wild River status.			
LUDs	Modified Landscape, Remote Recreation, Semi-Remote Recreation, Wild River, and Transportation and Utility System		
ROS	Primitive, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized		
National Forest Shoreline Miles	83 miles		
National Forest Shoreline Acres	19,583 acres		
Communities	Skagway, pop. 825; Haines, pop. 1,811		
Alaska Coastal Management Act	Skagway Coastal Management Program Haines Coastal Management Program		
Forest Service Facilities			
Public Recreation Cabins	Katzeihin (limited access and not within the rental system)		
Non-National Forest System Lands Otter Creek Hydroelectric			
Recreation Use			
Area Attractions	Scenic views and hunting, and fishing		
Commercial Use	By far, the highest use in the area is as a pass-through for over 700,000 cruise ship passengers arriving in Skagway. Other uses include guided big game hunting and fishing. This area is a primary flight path for flightseeing and local commuter aircraft. Airboats are used in the Katzeihin River area to travel inland from Lynn Canal.		
Non-commercial Use	Fly in visits to Katzeihin cabin, hunting, fishing, sightseeing, and Alaska Marine Highway		
Use Patterns	Commercial fishing, Alaska Marine Highway route, boat-based outfitter guide activity and recreational boaters		
Primary Use Areas	Taiya Inlet, Lynn Canal, Katzeihin River, wheeled aircraft land on an unmaintained airstrip near Katzeihin River and there is airboat use within the Katzeihin River drainage.		
Areas of Concern	Beginning two miles inland from mean high tide along Lynn Canal, the Katzeihin River is a recommended Wild River.		

Use Area 01-01

Skagway Area – Juneau Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions on subsistence resource users.
Wildlife	NMFS has identified two Steller sea lion haul outs in this use area. Twenty-nine mapped bald eagle nests also occur in this use area.
Fisheries	The terrain in this area drops steeply into Lynn Canal offering little habitat for fish spawning or rearing. Five Class I streams have been mapped in the area. No streams were identified as having high fishing values.
Botany	Four surveys were completed along the shoreline covering 0.25 miles. One survey in a saline meadow near the mouth of the Katzechin River identified <i>Eleocharis kamtschatica</i> .
Cultural/Heritage	Five surveys have been completed covering 2.25 miles. Five historic sites were identified.

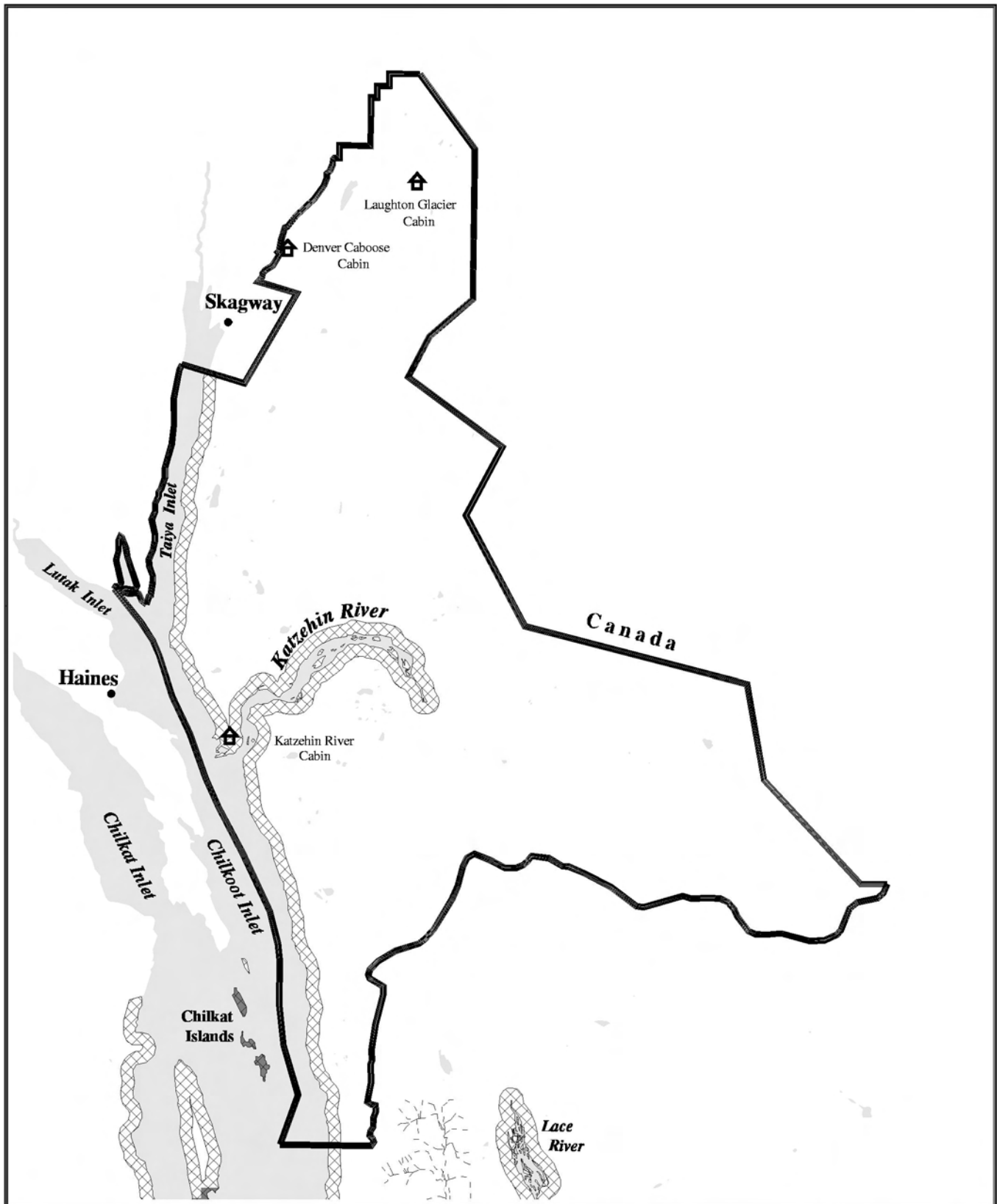
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		42	424	47	210	530	235	21	53	24	42	212	118
Enclaves	N/A	None			Katzechin Falls			None			Katzechin Falls		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Skagway Area Use Area - 01-01



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR



Use Area 01-02

Haines Area – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
5	210	530	235
<u>Description</u> <p>This use area includes the western shoreline of Lynn Canal from Taiya Point near Skagway, to Haines, and south to Sullivan Island. Only a small portion of the mainland near Sullivan Island is within the Juneau Ranger District. There are few sheltered anchorages along this stretch of shoreline and weather conditions frequently cause rough seas in this portion of Lynn Canal, which limits use.</p> <p>LUDs Modified Landscape, Semi-Remote Recreation, and Transportation and Utility System.</p> <p>ROS Semi-Primitive Motorized and Semi-Primitive Non-Motorized.</p> <p>National Forest Shoreline Miles 10 miles</p> <p>National Forest Shoreline Acres 2,372 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Haines Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>Most of the shoreline in this area falls within the Haines State Forest and Resource Management Area, Chilkat State Park, and the Sullivan Island State Marine Park. There are also private inholdings within this use area.</p>			
<u>Recreation Use</u> <p>Area Attractions Scenic, hunting and fishing</p> <p>Commercial Use Very low</p> <p>Non-commercial Use This area is primarily used by Haines and Skagway residents and some Juneau residents</p> <p>Use Patterns Some localized use on Sullivan Island</p>			

Use Area 01-02

Haines Area – Juneau Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, there are 13 mapped bald eagle nests

Fisheries

Three Class I streams have been mapped in this area. No streams were identified with high fishing values.

Botany

There are no known sensitive plants within this use area. This area has not received intensive surveys.

Cultural/Heritage

There are no known cultural sites within this use area. Two surveys have been completed covering two miles.

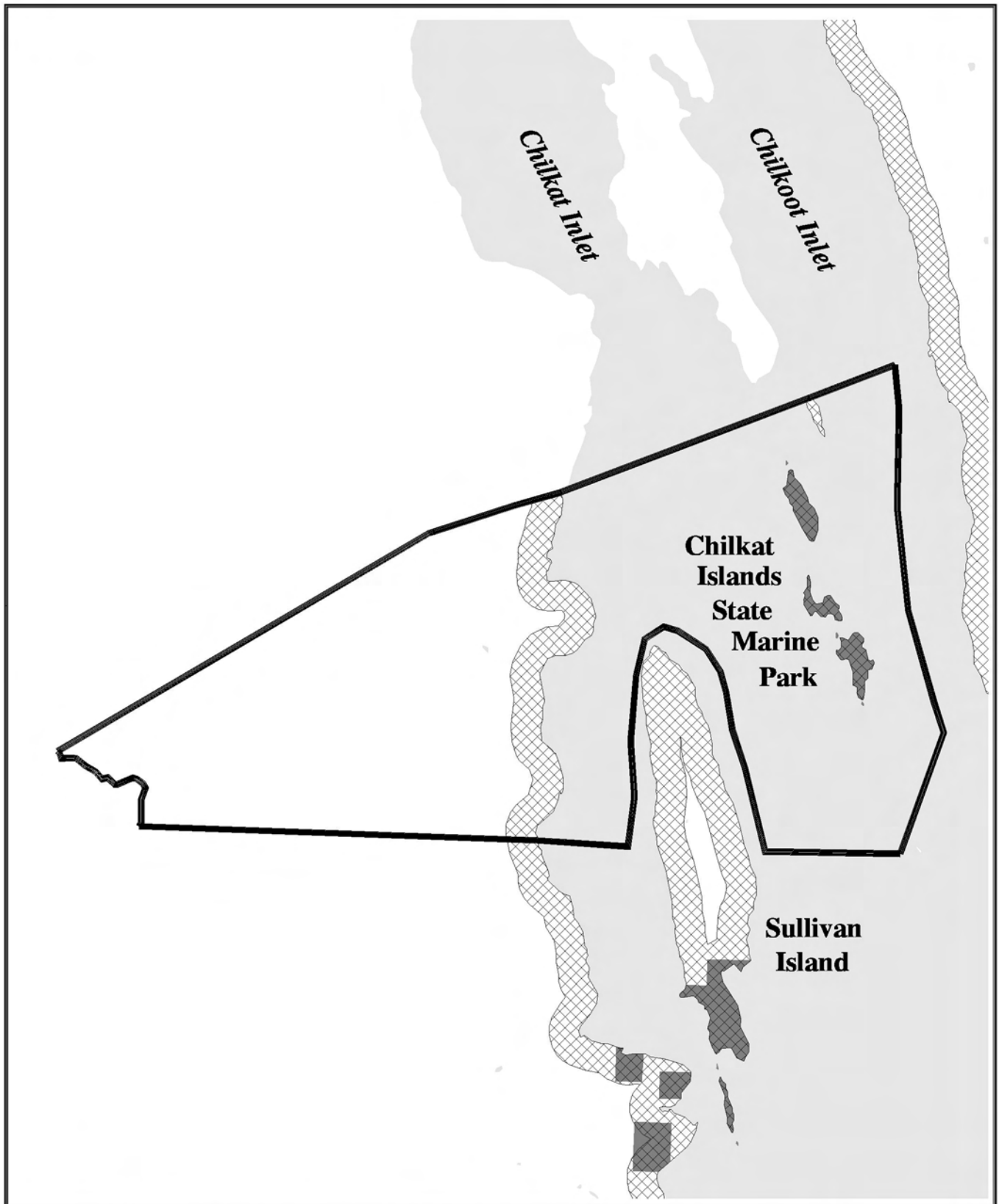
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		21	212	24	105	265	118	15	30	15	21	106	59
<i>Enclaves</i>	N/A	None			Sullivan Mountain			None			Sullivan Mountain		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Haines Area
Use Area - 01-02



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin



USE AREA
LOCATOR

1 0.5 0 1 2 Miles

Scale in Miles

Use Area 01-03

East Chilkats – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
20	840	2120	940
<u>Description</u> <p>This use area is adjacent to Glacier Bay National Park to the west and includes the western shoreline of Lynn Canal from Sullivan Island Marine Park to Point Couverden and the shoreline on the east side of Excursion Inlet. The Homeshore area has had previous logging, and a road system exists in this area.</p> <p>LUDs Modified Landscape, Old-Growth, Semi-Remote Recreation, Scenic Viewshed, and Transportation and Utility System</p> <p>ROS Roaded Modified, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 102 miles</p> <p>National Forest Shoreline Acres 29,324 acres</p> <p>Communities In Excursion Inlet, there is a small community and cannery at Ward Cove, and the Excursion Inlet Seaplane Base.</p> <p>Alaska Coastal Management Act The northern boundary abuts the Haines Coastal Management Zone boundary.</p>			
<u>Forest Service Facilities</u> <p>A logging road system on Point Couverden, storage units, and trailer pads associated with timber sale planning are located within this use area. There is an existing log transfer facility site at Homeshore.</p>			
<u>Non-National Forest System Lands</u> <p>Private and state lands are located at Sullivan Island, William Henry Bay, St. James Bay, and in Excursion Inlet. The State of Alaska administers St. James Bay State Park, a marine park at Pt. Couverden, and maintains a floating dock offshore at Pt. Couverden.</p>			
<u>Recreation Use</u> <p>Area Attractions Scenic views, wildlife viewing, some hunting and fishing</p> <p>Commercial Use Brown and black bear hunting, moose hunting, freshwater fishing, sightseeing, and bicycle tours</p> <p>Non-commercial Use Non-commercial use is generally offshore sport fishing, deer, moose and black bear hunting.</p> <p>Use Patterns Shoreline use in this area is primarily by residents of Haines, Juneau, Skagway, Hoonah, Gustavus, and Excursion Inlet.</p>			

Use Area 01-03

East Chilkats – Juneau Ranger District

Primary Use Areas

Excursion Inlet, Howard Bay, the log transfer site at Homeshore, William Henry Bay, Square Bay, and Boat Harbor. Fixed wing aircraft land at the mouth of the Endicott River to access the area. The area inside the tree line has many trails and old logging roads. There is an unmaintained airstrip, which gets moderate use just inside the tree line at Endicott River.

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, 345 bald eagle nests have been mapped.

Fisheries

This area contains productive fish streams important to the commercial fishing industry, non-guided sport fish users, and the guided sport fishing industry. Guided sport fishing use is focused on early season Dolly Varden char and mid-season pink salmon fishing opportunities. Twenty-six Class I streams have been mapped in this area, of which seven streams in this area have been identified with high fishing values. Most of these streams support populations of chum, pink, and coho salmon, as well as Dolly Varden char and cutthroat trout. A small stream in the area supports a small run of sockeye salmon that are an important subsistence resource for residents of Hoonah. Small runs of steelhead are found in some systems. A stream on the west side of Excursion Inlet is productive for its size and contains both summer and fall runs of chum salmon.

Botany

Two different *Botrychium* species in addition to *Zigadenus elegans* and *Platanthera obtusata* were recorded during nine surveys. These species all occurred within the beach meadow or upper estuary meadow vegetation community types. Beach meadows, especially at Howard Bay and Endicott River, are an attraction.

Cultural/Heritage

Two historic and 11 prehistoric sites were identified in 9 surveys covering 14.5 miles.

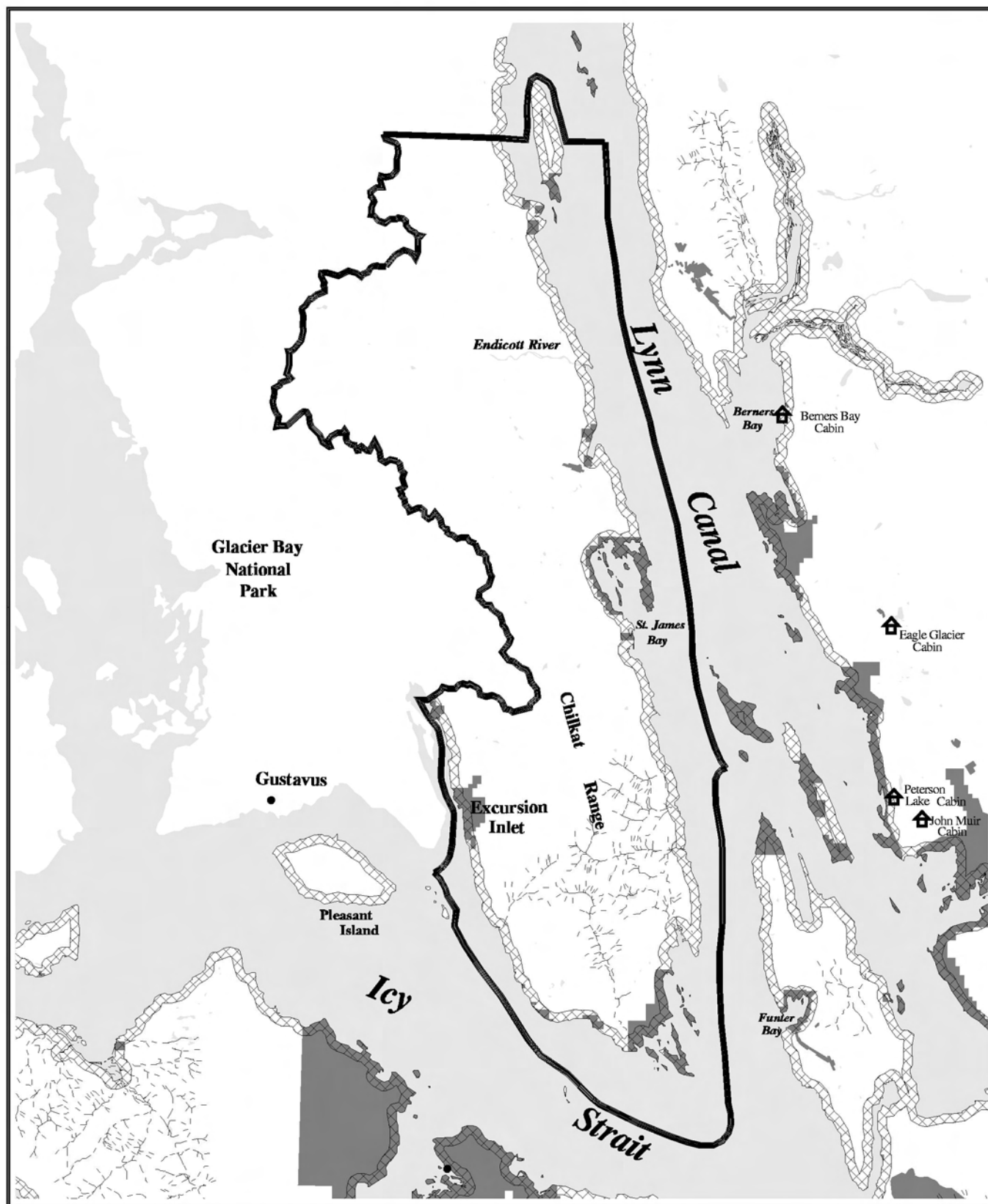
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)		Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
	N/A	84	848	94	420	1,060	470	42	106	47	84	424	235
Enclaves	N/A	None			Howard Bay								
					Cant Cove								
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

East Chilkats Use Area - 01-03



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



0 1 2 Miles
Scale in Miles

Use Area 01-04A

Berners Bay – Juneau Ranger District

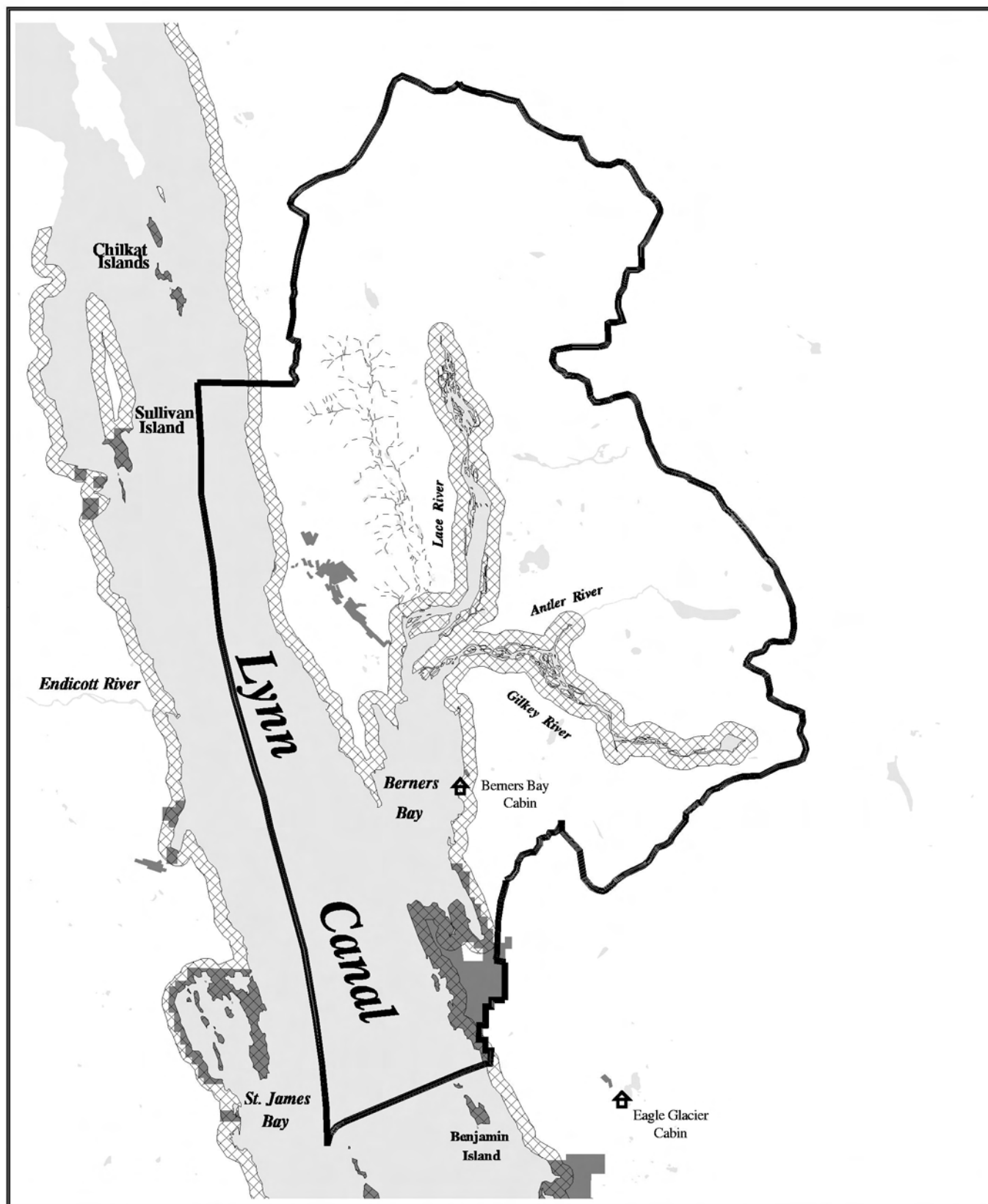
<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
10	420	1,060	470
<u>Description</u> This use area includes the shoreline from approximately 16 miles north of Berners Bay east of Sullivan Island, to Echo Cove. Berners Bay itself is rich in wildlife, including sea lions, porpoises, sea birds and whales. The Juneau road system ends at Echo Cove, where a small harbor is located. This area has been proposed for a transportation corridor between Juneau and Skagway.			
<i>LUDs</i>	LUD II, Modified Landscape, Old Growth, Remote Recreation, Semi-Remote Recreation, Scenic Viewshed, Wild River, and Transportation and Utility System		
<i>ROS</i>	Primitive, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized		
<i>National Forest Shoreline Miles</i>	260 miles		
<i>National Forest Shoreline Acres</i>	35,288 acres		
<i>Communities</i>	A portion of the City and Borough of Juneau is within this use area. A small community exists at Kensington mine, and at Echo Cove on private land.		
<u>Forest Service Facilities</u>			
<i>Public Recreation Cabins</i>	Berners Bay		
<u>Non-National Forest System Lands</u> The Kensington mine, a major silver producer, is located just above Pt. Sherman. A smaller private mine, the Jualin, is on the north side of Berners Bay, and a private church camp exists on an old homestead located at Echo Cove. The state maintains a small harbor at Echo Cove, which is the end of the Juneau road system. Goldbelt, a Native corporation that owns timberland, has considered developing a ferry terminal and other facilities in this location. There is a state park at Point Bridget, and private residences along the shoreline.			
<u>Recreation Use</u>			
<i>Area Attractions</i>	Scenic views, kayaking, fishing, hunting, sightseeing and nature watching		
<i>Commercial Use</i>	Commercial kayak tours and floatplane tours operate in the area, especially in the vicinity of the mouth of the Antler River in addition to wildlife watching tours.		
<i>Non-commercial Use</i>	Berners Bay receives substantial boat-based use from Juneau residents, and the area is a popular kayak destination. Shoreline areas north of Berners Bay do not attract the activity found within the bay.		
<i>Use Patterns</i>	Use in this area is varied and high including, commercial gillnetting, commercial sport fishing, flightseeing tours, land-based tours, and subsistence use. Berners Bay has cultural significance for Native groups in the area. Cruise ships and the Alaska Marine Highway system travel close to shore outside the bay. Airboats are used to access inner bay areas.		

Use Area 01-04A

Berners Bay – Juneau Ranger District

Primary Use Areas	Berners Bay is the primary focus of activity.												
Areas of Concern	Potential development on private land at Cascade Point. The Gilkey River is a recommended Wild River.												
<u>Management/Resource Considerations</u>													
Subsistence	There are no anticipated restrictions on subsistence resource users.												
Wildlife	NMFS has identified one Steller sea lion haul-out; 129 bald eagle nests have been mapped in this use area.												
Fisheries	Watersheds in this use area are large producers of coho, pink and chum salmon. Sixteen Class I streams have been mapped in the area, two with high fishing values. The Berners River, a tributary to Berners Bay, is used by ADF&G Commercial Fisheries Division as a coho salmon index stream. Local sport fishers use the tributaries of Berners Bay, primarily Berners River. Because of the shallow nature of the inner bay, most of this use takes place via airboats and jet boats, which keeps fishing use low.												
Botany	No rare or sensitive plants have been detected from three surveys.												
Cultural/Heritage	Six prehistoric and three historic sites have been identified from 11 surveys covering 28.5 miles.												
<u>Alternative Comparisons</u>													
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		42	106	47	210	530	235	21	53	24	42	106	118
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		
<u>Mitigation</u>													
See Appendix C for mitigation measures.													
Guided use on Cowee Creek and Sawmill Creek will not be allowed on weekends or on state or federal holidays to reduce the potential for conflicts with unguided users. Guided use must not displace unguided users.													

Berners Bay
Use Area - 01-04A



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

10.50 1 2 Miles
Scale in Miles



Use Area 01-04B

North Juneau Coast – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area extends from Point Bridget State Park along the Juneau Road System and the shoreline from south of Pt. Bridget State Park to Point Salisbury, including Douglas, Shelter, Lincoln, and Benjamin Islands. Continuing south from Point Bridget State Park along the Juneau road system, the use area extends to just south of Thane to Point Salisbury.</p> <p>LUDs Old Growth, Semi-Remote Recreation, Scenic Viewshed, and Transportation and Utility System</p> <p>ROS Rural, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 30 miles</p> <p>National Forest Shoreline Acres 11,185 acres</p> <p>Communities Population of the combined Juneau–Douglas community is more than 30,000 people.</p> <p>Alaska Coastal Management Act Juneau District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Numerous trails and developed recreation associated with the road system are excluded from this analysis.</p>			
<u>Non-National Forest System Lands</u> <p>Land ownership along much of the shoreline, mainland, and on the islands is other than national forest. Shelter Island has private residences, and a state marine park. Lincoln Island is in private ownership. Benjamin Island is not in the National Forest System. Recreation residences occur on the west side of Douglas Island near Pt. Hilda.</p>			
<u>Recreation Use</u>			
Area Attractions	Proximity to Juneau		
Commercial Use	This area has low commercial use in terms of special use authorizations, though the marine areas adjacent to land receive heavy commercial use.		
Non-commercial Use	Private vessels actively utilize Stephens Passage on the west side of Douglas Island. Other non-commercial activities in this area include beachcombing, wildlife watching, fishing, picnicking, camping, hiking, kayaking, and other water and shore-based activities.		
Use Patterns	Activity is concentrated primarily along the Juneau road system; harbors at Auke Bay, Harris, Aurora, and Douglas Harbors; and North Douglas Boat Launch. The area is on a primary flight path for the Juneau International Airport and for flightseeing tours.		
Primary Use Areas	Concentrated use occurs on most beach access points along the Juneau road system and east to the north Douglas shoreline. Areas of primary concentration on national forest would be Eagle Beach, Auk Recreation site, the Dupont Trail, and the west side of Douglas Island.		

Use Area 01-04B

North Juneau Coast – Juneau Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

NMFS has identified one Steller sea lion haul-out. In this use area, 319 bald eagle nests have been mapped.

Fisheries

Two Class I streams have been mapped in this area and are not associated with high fishing values. The majority of streams within the use area occur on land owned by the City of Juneau. These streams are important to local residents and contain stocks of chum, pink, and coho salmon, Dolly Varden char and cutthroat trout. Small populations of steelhead are produced in a few of these systems. Some of the streams in the Gastineau Channel area receive hatchery-enhanced runs of coho, chum, and king salmon. Because of their easy access by Juneau sport fishers, most receive some degree of sport fishing use. Salt-water surrounding this area receives heavy guided fishing use.

Botany

Individuals of the genus *Botrychium* were documented within an upper estuarine meadow. Six surveys were conducted in the area.

Cultural/Heritage

Eight historic and five prehistoric sites have been identified within this use area from three surveys covering 4.25 miles.

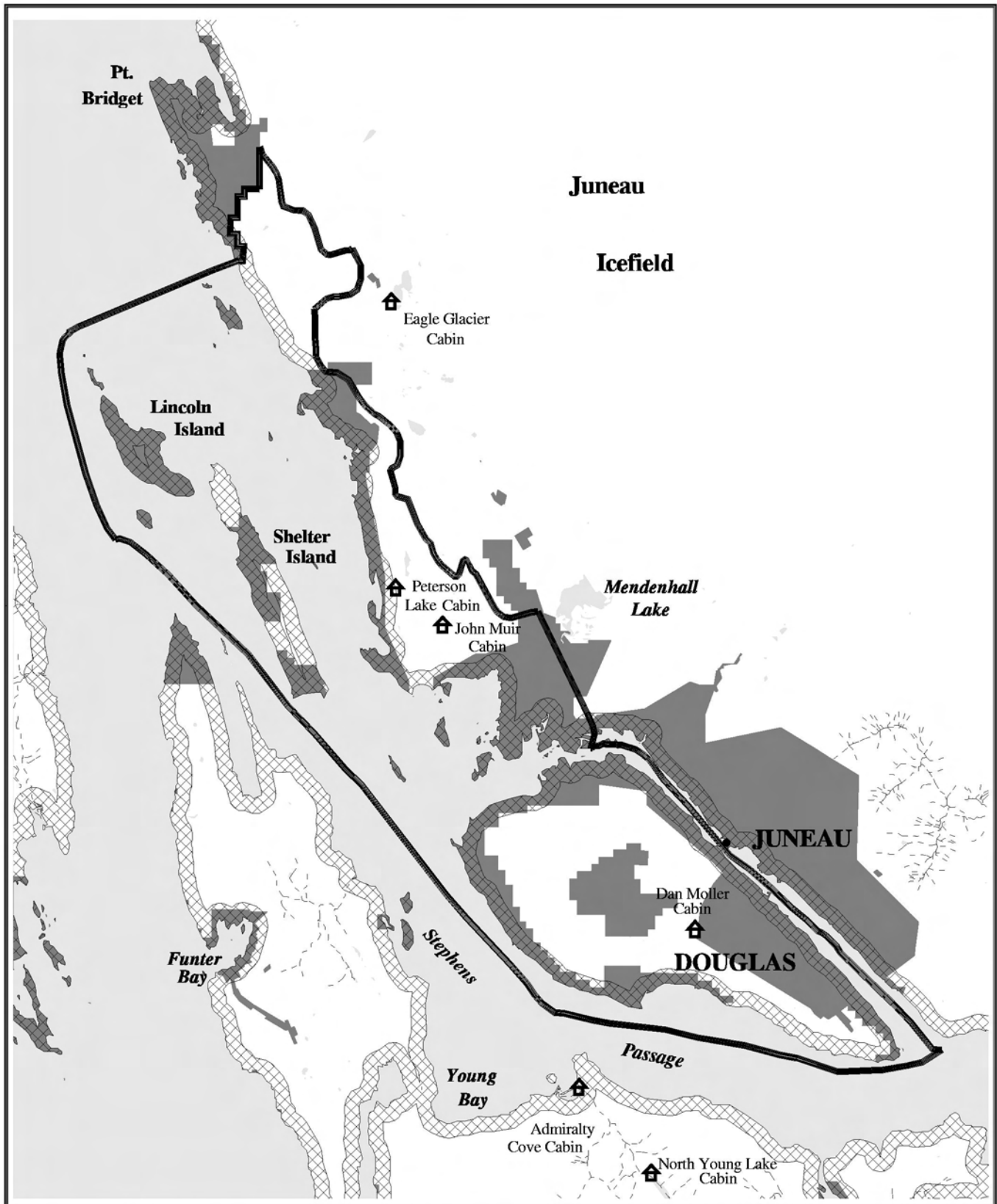
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	64	28	126	318	141	15	32	15	25	64	71
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

North Juneau Coast
Use Area - 01-04B



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 01-04C

Taku Inlet – Juneau Ranger District

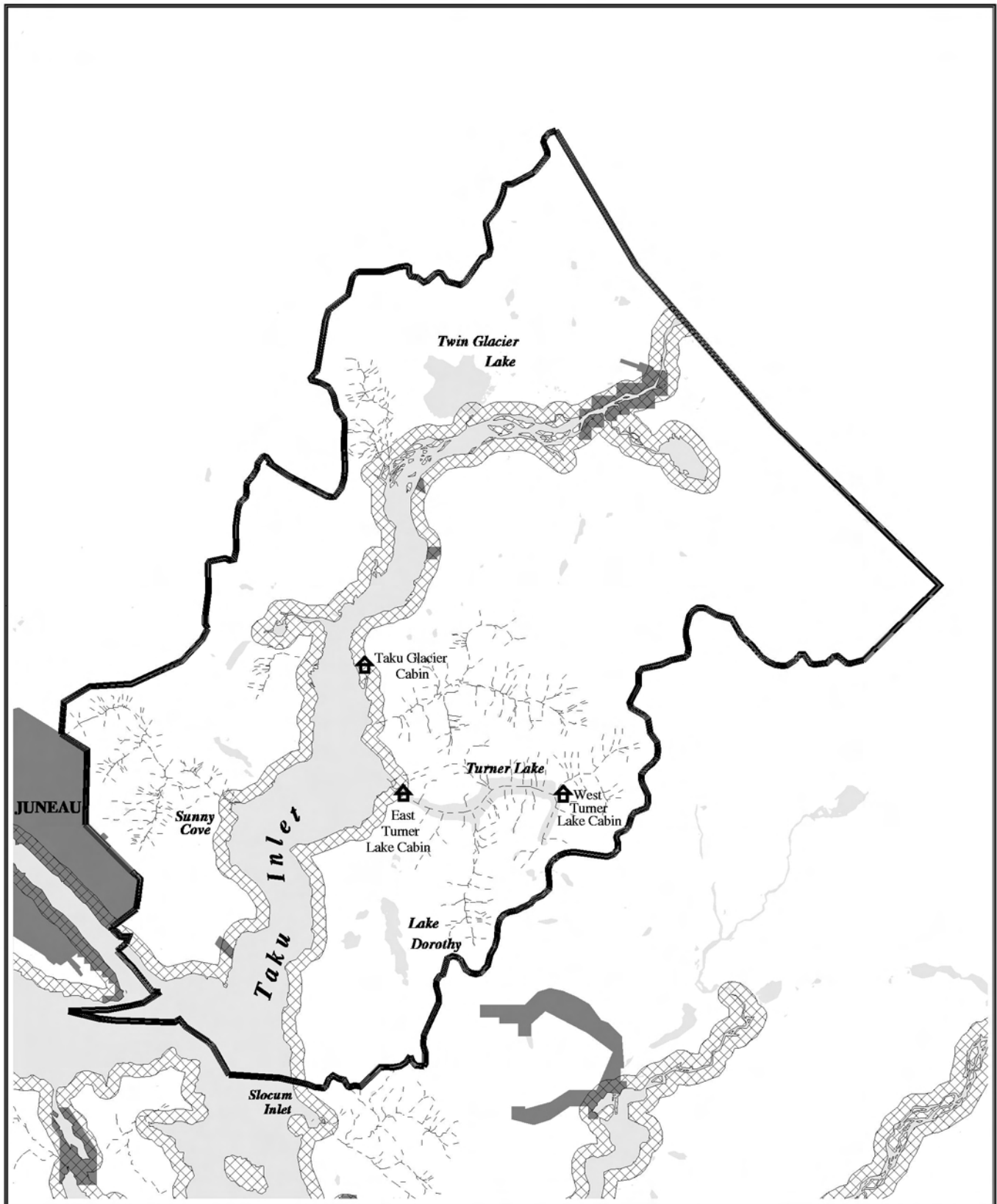
<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
12	504	1,272	564
<u>Description</u> <p>This use area includes Pt. Bishop, the Taku River to the Canadian border and south of Taku Inlet to north of Slocum Inlet on the east side of Stephens Passage. The Taku River is a heavily used flight-seeing corridor, and receives significant fishing and pleasure craft use as well. The Taku River is of cultural significance. The river has tidal influences for miles upriver, which limit navigation, and is subject to annual outburst flooding from glacier dams upstream.</p> <p>LUDs Old Growth, Remote Recreation, Semi-Remote Recreation, Scenic Viewshed, and Transportation and Utility System</p> <p>ROS Primitive, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 163 miles</p> <p>National Forest Shoreline Acres 35,377 acres</p> <p>Communities A small enclave of homes near the Canadian border</p> <p>Alaska Coastal Management Act Juneau District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Taku Glacier Cabin</p> <p>Trails Pt. Bishop</p>			
<u>Non-National Forest System Lands</u> <p>Annex Creek power plant and penstock are situated on the north Taku Inlet shoreline about 3 ½ miles upriver from Stephens Passage. On the south shore about 6 miles upriver, Taku Lodge operates primarily during the summer. Additionally, there is an area of homes and property near the Canadian border. Private recreation cabins are located near Twin Glacier Lake, Yehring Creek, and other locations within Taku inlet. Lake Dorothy Hydro Project is being planned for near the river mouth.</p>			
<u>Recreation Use</u> <p>Area Attractions Scenic views and glaciers</p> <p>Commercial Use Guided sport fishing and hunting, commercial fishing, occasional kayak touring</p> <p>Non-commercial Use These activities include fishing, day boating, hiking, and hunting for goat, moose and bear. Most activities on Forest Service lands outside of flightseeing are water-based.</p>			

Use Area 01-04C

Taku Inlet – Juneau Ranger District

Use Patterns	This area includes a heavily used flightseeing route (up to 30,000 passengers during the summer season) to the Taku and Norris Glaciers. There is also a high volume of floatplane traffic to sightsee and to access the Taku Lodge.												
Primary Use Areas	Though the waterway receives considerable use, few shoreline activities occur downriver due to inaccessible shoreline and the vagaries of river bars.												
<u>Management/Resource Considerations</u>													
Subsistence	An annual average of 121 personal use-fishing permits have been returned for use on the Taku River. There are no anticipated restrictions on subsistence resource users due to this project.												
Wildlife	NMFS has identified one Steller sea lion haul-out in this area. Thirty-three bald eagle nests have been mapped in this area but it is assumed that nests are located along the shoreline in numbers at least equal to surveyed areas to the west.												
Fisheries	Thirty-four Class I streams have been mapped in this area and 5 were identified with high fishing values. Though outside the analysis area, the Taku River system is a large transboundary river that supports stocks of all five pacific salmon species, Dolly Varden char, and cutthroat trout. The system is important to Alaskan and Canadian commercial, sport, and subsistence fisheries. Juneau residents use the lower Taku River and its tributaries for recreational sport fishing.												
Botany	No rare or sensitive plants were identified from seven surveys that covered approximately one mile of shoreline.												
Cultural/Heritage	Five surveys covering 1.25 miles revealed four historic sites.												
<u>Alternative Comparisons</u>													
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		50	127	56	252	636	282	25	64	28	50	127	141
Enclaves	N/A	None			Sunny Cove			Sunny Cove			Sunny Cove		
15% Areas	N/A	None			None			None			None		
<u>Mitigation</u>													
See Appendix C for mitigation measures.													
Outfitter/guide use will not be allowed on Turner Creek on weekends or during state and federal holidays to reduce the potential conflicts with unguided users.													

Taku Inlet
Use Area - 01-04C



- Use Area Boundary
- High Value Freshwater Fishing Streams
- Shoreline Use Zone

- Non National Forest Land
- Salt and Fresh Water
- Forest Service Recreation Cabin

10.50 1 2 Miles

Scale in Miles



Use Area 01-04D

Slocum Inlet – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
10	420	1,060	470
<u>Description</u> <p>Includes Slocum Inlet and the surrounding area. Its proximity to Juneau and shelter it provides from Taku winds make it an easily accessible and a popular destination.</p> <p>LUDs Old Growth, Scenic Viewshed, Timber Production, and Transportation and Utility System</p> <p>ROS Roaded Modified, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 5 miles</p> <p>National Forest Shoreline Acres 1,459 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Juneau District Coastal Management Program</p> <p><u>Forest Service Facilities</u></p> <p>None</p> <p><u>Non-National Forest System Lands</u></p> <p>None</p> <p><u>Recreation Use</u></p> <p>Area Attractions Hunting, fishing, and crabbing</p> <p>Commercial Use Although Slocum Inlet is somewhat shallow, it does receive commercial fishing use. Crabpot storage is authorized inside the inlet in support of the commercial Dungeness crab harvest. Commercial outfitter guided freshwater fishing occurs at the head of the inlet.</p> <p>Non-commercial Use This area is attractive for saltwater personal fishery and sport fishing, clamming, Dungeness and king crabbing. It is also a popular hunting area. In the past, it has been proposed as a possible area for transplanting Juneau's 'garbage bears'.</p> <p>Use Patterns Although small, Slocum Inlet receives intense local use from commercial fishing and crabbing as well as from recreational users. There is a power transmission line that transects this area.</p> <p>Primary Use Areas Head of Slocum Inlet</p>			

Use Area 01-04D

Slocum Inlet – Juneau Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions on subsistence resource users as a result of this project.
Wildlife	NMFS has identified one Steller sea lion haul-out in the use area. There are 3 mapped bald eagle nests in this use area.
Fisheries	Three Class I streams have been mapped in this area, one of which is identified as a high value fishing stream. It is located at the head of the bay, with a large inter-tidal grass flat, and supports abundant runs of pink and chum salmon. This stream receives little non-guided sport fishing pressure. Because of its relatively close proximity to Juneau, few potential conflicts with non-guided fishers, and consistent runs of pink and chum salmon, this stream receives relatively high use from guided sport fishers.
Botany	There are no known sensitive plants in this use area. This area has not received intensive surveys.
Cultural/Heritage	No sites were identified during one survey that covered 4.75 miles.

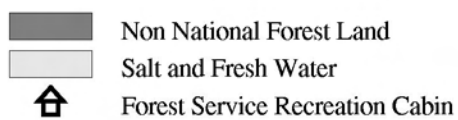
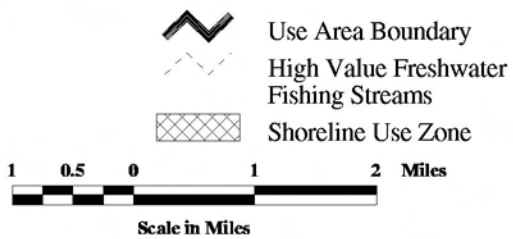
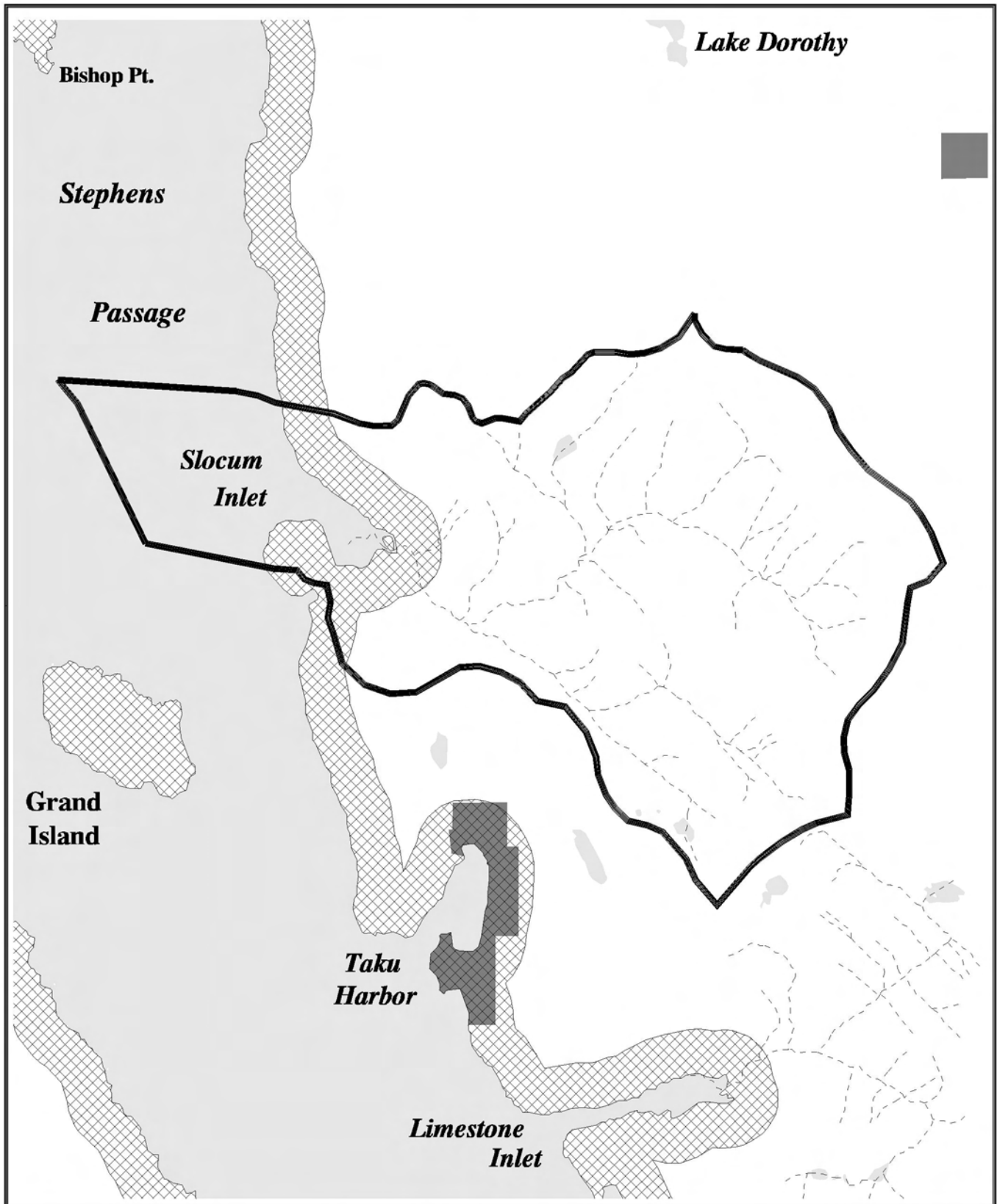
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		42	106	47	210	530	235	21	70	24	42	106	118
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Slocum Inlet
Use Area - 01-04D



Use Area 01-05A

Taku Harbor – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area extends from Circle Point to the mouth of Port Snettisham along the eastern shoreline of Stephens Passage. Taku Harbor is the largest protected anchorage between Juneau and Port Snettisham.</p> <p>LUDs Old Growth, Research Natural Area, Scenic Viewshed, and Transportation and Utility System</p> <p>ROS Primitive and Semi-Primitive Non-Motorized, and Roaded Natural</p> <p>National Forest Shoreline Miles 20 miles</p> <p>National Forest Shoreline Acres 5,340 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Juneau District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>Uplands in Taku Harbor were state-selected for community recreation. A state marine park and two private parcels are located along the shoreline. The state maintains a public dock within Taku Harbor.</p>			
<u>Recreation Use</u> <p>Area Attractions Community anchorage, kayaking, and wildlife viewing</p> <p>Commercial Use Guided freshwater fishing at the head of the bay, commercial gill netting, and crab pot storage</p> <p>Non-commercial Use Uses include saltwater sport fishing, nature watching, hiking, personal clam harvest, and crabbing. Suicide Cove is used as a destination and haul out for kayakers. Slocum Inlet is also used by kayakers as a rest stop on the way north across Taku Inlet.</p> <p>Use Patterns Proximity to Juneau makes Limestone Inlet and Taku Harbor both easily accessible and popular destinations. The area receives heavy boat traffic, including cruise ships and barges.</p> <p>Primary Use Areas Limestone Inlet and Taku Harbor</p>			

Use Area 01-05A

Taku Harbor – Juneau Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

There are 20 mapped bald eagle nests in the use area.

Fisheries

Two Class I streams have been mapped in this area. There is a very small stream that enters Taku Harbor, which likely does not support significant runs of anadromous fish. Limestone Inlet has a high value fishing stream flowing through an inter-tidal grass flat that supports large runs of pink and chum salmon and likely receives little non-guided sport fishing pressure.

Botany

There are no known sensitive plants in this use area. This area has not received intensive surveys.

Cultural/Heritage

Two surveys covering 0.5 miles were conducted with one prehistoric site identified.

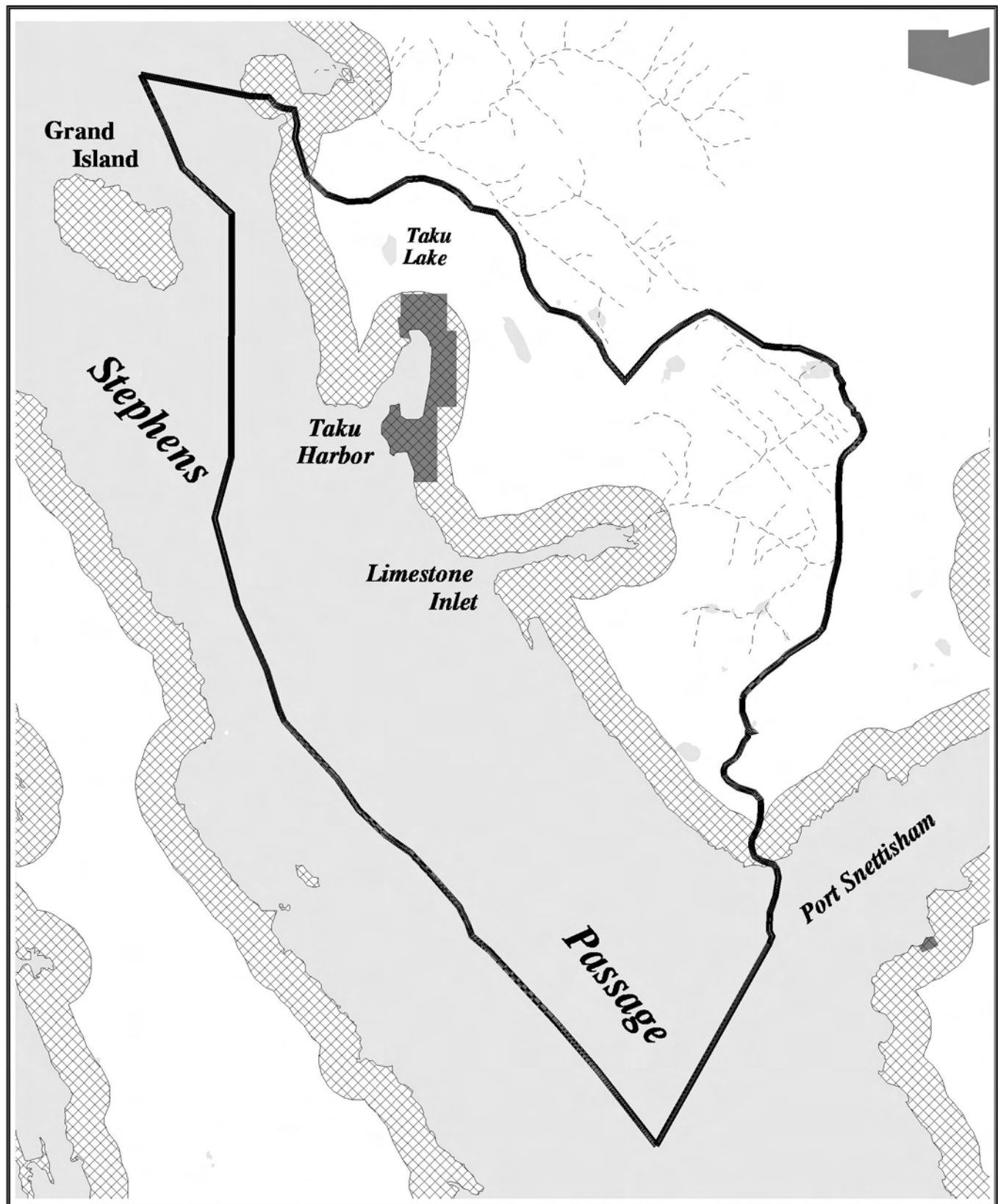
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	254	28	126	318	141	15	32	15	25	106	71
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Taku Harbor
Use Area - 01-05A



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

1 0.5 0 1 2 Miles

Scale in Miles



USE AREA
LOCATOR



Use Area 01-05B

Port Snettisham – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
20	840	2,120	940
<u>Description</u> From Point Coke at the entrance of Port Snettisham and south to the entrance of Holkham Bay <i>LUDs</i> Modified Landscape, Old Growth, Remote Recreation, Semi-Remote Recreation, Scenic Viewshed, Timber Production, and Transportation and Utility System <i>ROS</i> Primitive, Roaded Natural, Semi-Primitive Motorized, Semi-Primitive Non-Motorized, and Rural <i>National Forest Shoreline Miles</i> 226 miles <i>National Forest Shoreline Acres</i> 47,752 acres <i>Communities</i> None <i>Alaska Coastal Management Act</i> Juneau District Coastal Management Program			
<u>Forest Service Facilities</u> None			
<u>Non-National Forest System Lands</u> The largest private inholding includes the Port Snettisham Power Plant situated on 2,666 acres of state-selected lands. It provides power to the City and Borough of Juneau. There is also a large fish hatchery on private land.			
<u>Recreation Use</u> <i>Area Attractions</i> Close to Tracy Arm Wilderness, which allows for both a visit to Tracy Arm and shore excursion on same day, unaltered forest, shoreline conducive to walking, salmon viewing. Fishing and hunting occur within Port Snettisham and Gilbert Bay, in particular. <i>Commercial Use</i> Mountain goat and brown bear hunting and sightseeing <i>Non-commercial Use</i> Activities include wildlife viewing, bear hunting, and freshwater fishing; this unit is easily accessible from Juneau and has a number of anchorages. <i>Use Patterns</i> This area receives a high number of commercial gillnetting, shrimping, and crabbing vessels. Williams Cove receives concentrated use from commercial sightseeing and nature watch tours. <i>Primary Use Areas</i> Mallard Cove, Whiting River, Sweetheart Creek, and the head of Gilbert Bay, and Williams Cove			

Use Area 01-05B

Port Snettisham – Juneau Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions to the use of subsistence resources due to this project
Wildlife	NMFS has identified one Steller sea lion haul-out in this use area. There are 89 mapped bald eagle nests.
Fisheries	Thirty-four Class I streams have been mapped in this area. There are several tributary streams and lakes in the Whiting River drainage that provide sport-fishing opportunities. All of these streams and lakes are outside of the shoreline zone. A stream in Speel Arm will likely have large numbers of hatchery-enhanced sockeye salmon in the future making it attractive to both guided and non-guided sport fishers. Gilbert Bay contains three streams with high fishing values. The outlet stream of Sweetheart Lake supports a hatchery enhanced run of sockeye salmon, is a popular personal use fishery for residents of Juneau, and provides some sport fishing opportunities.
Botany	No rare or sensitive plants were found after the completion of two surveys that covered 0.5 miles of shoreline.
Cultural/Heritage	Two prehistoric sites were identified in this use area from one survey covering 0.25 miles.

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		84	848	94	420	1,060	470	42	156	47	84	424	235
Enclaves	N/A	None			Mallard Cove			Mallard Cove			Mallard Cove		
					West Gilbert Bay			West Gilbert Bay			West Gilbert Bay		
					No Name Cove*			No Name Cove*			No Name Cove*		
					Point Anmer						Point Anmer		
15% Areas	N/A	None			Point Coke			None			Point Coke		

* Williams Cove may be substituted for No Name Cove in any alternative.

Mitigation

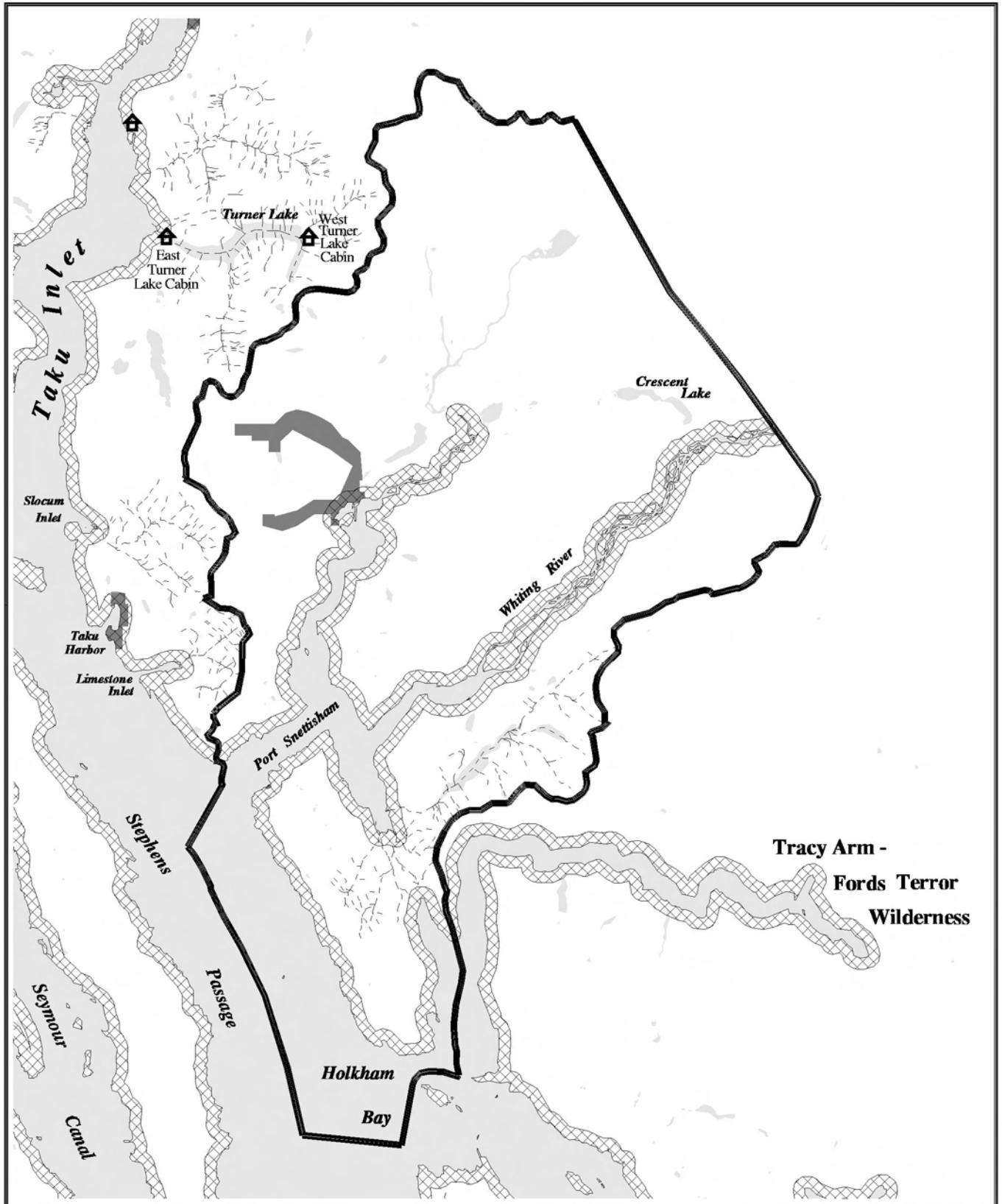
See Appendix C for mitigation measures.

Guided fishing use is prohibited during the personal use sockeye fishery in Sweetheart Creek (Gilbert Bay). No more than two guided groups may be present at one time during other times of the year to avoid potential conflicts with unguided users.

State sport fishing regulations are in place to regulate fishing near fish structures on Crescent and Speel Lakes, as well as streams draining into Gilbert Bay.

Port Snettisham

Use Area - 01-05B



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

10.50 1 2 Miles

Scale in Miles



Use Area 01-05C

Windham Bay – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
26	1,092	2,756	1,222
<u>Description</u> <p>This use area extends from Pt. Astley to west of Endicott Arm, southward to Windham Bay continuing to the Juneau Ranger District Boundary south of Port Houghton. Windham Bay is a popular area for hunting, and for private, as well as commercial vessels, despite its narrow channel. It serves as an entry point to Chuck River Wilderness. Hobart Bay is an area that has had extensive logging, and is under private ownership.</p> <p>LUDs Old Growth, Semi-Remote Recreation, Scenic Viewshed, Timber Production, Wilderness, and Wilderness Monument</p> <p>ROS Roaded Modified, Roaded Natural, Primitive, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 141 miles</p> <p>National Forest Shoreline Acres 35,191 acres</p> <p>Communities Hobart Bay</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Port Houghton</p> <p>Trails Taylor Lake</p>			
<u>Non-National Forest System Lands</u> <p>Private property occurs in Hobart Bay. Extensive timber harvesting. The state maintains an offshore float for boats at Entrance Island where a recreation residence is also permitted. Private lands are also found in Port Houghton, Windham Bay, and the Chuck River.</p>			
<u>Recreation Use</u> <p>Area Attractions Close to Tracy Arm allowing for same day visit with shore excursion. Scenic views, unaltered forest, wildlife viewing, kayaking, good beach access, diversity of landforms.</p> <p>Commercial Use Freshwater fishing, wildlife viewing, nature tours, black and brown bear hunting</p> <p>Non-commercial Use Fishing, camping, hunting</p> <p>Use Patterns Though some activity in this area originates from Juneau there is also influence from Petersburg, approximately 45 miles south.</p> <p>Primary Use Areas Sandborn Canal, the head of Port Houghton and Windham Bay</p>			

Use Area 01-05C

Windham Bay – Juneau Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

NMFS identified two Steller sea lion haul-outs in this use area. In this use area, 258 bald eagle nests have been mapped.

Fisheries

Forty-one Class I streams have been mapped in this area, with five of these identified as having high fishing values. This area is far from both Juneau and Petersburg, and therefore receives light sport fishing pressure. Chuck River supports runs of pink, chum, coho, and king salmon, Dolly Varden char, cutthroat trout, and possibly steelhead. Hobart Bay has one stream that was identified as having high fishing values. In addition to this system there is a salt-chuck located within Hobart Bay. These systems contain pink, chum, and coho salmon, as well as Dolly Varden char and cutthroat trout. Port Houghton contains very productive freshwater systems with four streams identified as having high fishing values. The largest of these is the Rusty River, which flows into the salt-chuck at the head of Port Houghton. This stream contains runs of pink, chum, sockeye, and coho salmon as well as Dolly Varden char, cutthroat trout, and possibly steelhead. Another important stream in Port Houghton is at the head of Sandborn Canal. This stream has runs of pink, chum, and coho salmon, Dolly Varden char, cutthroat trout, and steelhead.

Botany

Poa laxiflora was found at two sites associated with tufted hairgrass. Ten surveys were completed on 0.75 miles of shoreline.

Cultural/Heritage

Thirty surveys covering 51.5 miles revealed 8 historic and 6 prehistoric sites in this use area.

Alternative Comparisons

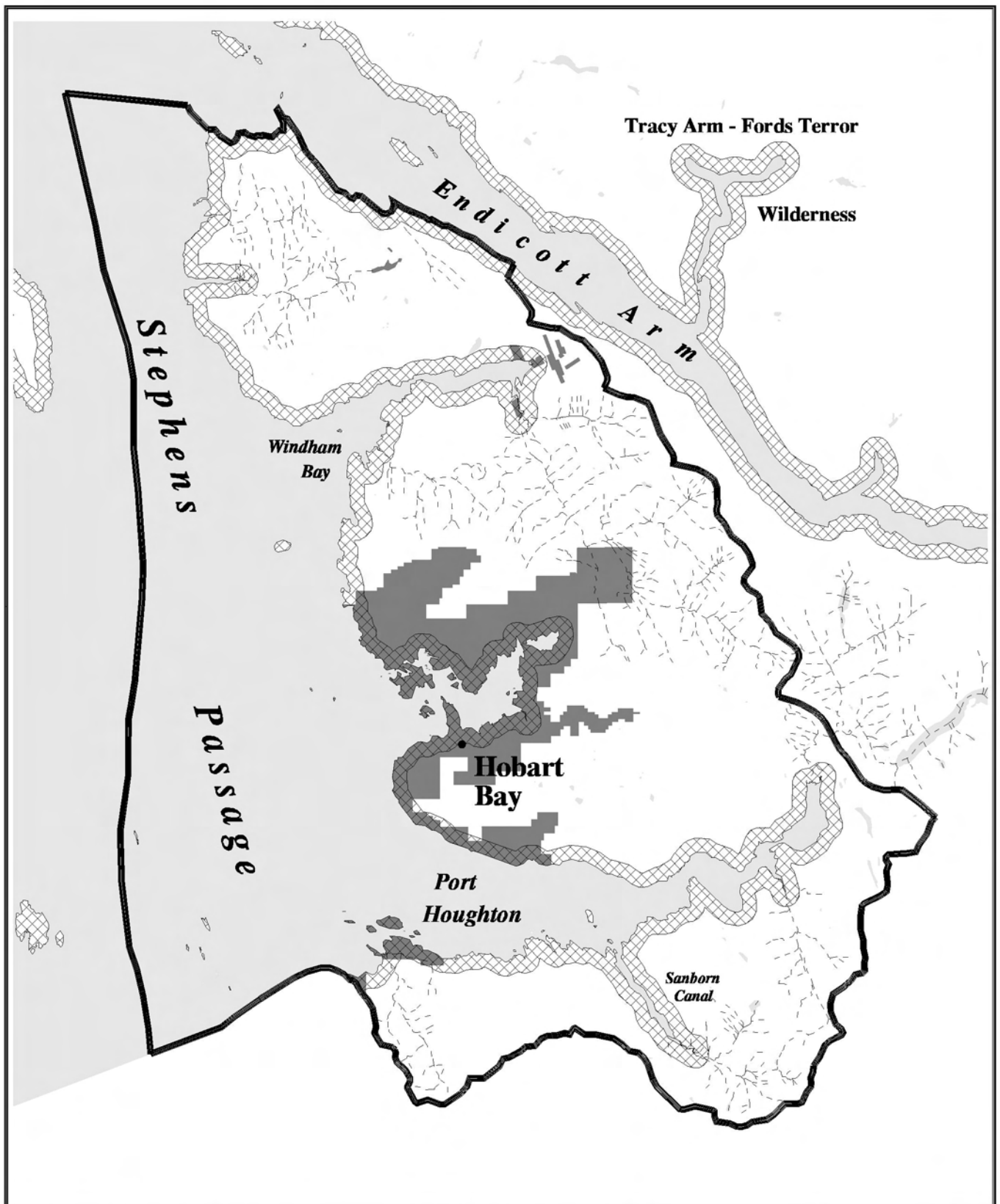
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		109	1,102	122	546	1,378	611	55	138	61	109	551	306
Enclaves	N/A	None			Sand Bay			Sand Bay			Sand Bay		
					N. Windham Bay						N. Windham Bay		
					Port Houghton			Port Houghton			Port Houghton		
					Fanshaw						Fanshaw		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

A cultural site management plan covering protection, interpretation, and monitoring will be in place before guided use will be permitted at the North Windham site for interpretive purposes.

Windham Bay
Use Area - 01-05C



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

10.50 1 2 Miles
Scale in Miles



Use Area 01-05D

Tracy Arm – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
12	504	1,272	564
<u>Description</u> This large use area includes the Tracy Arm and Endicott Arm Wilderness areas. LUDs Semi-Remote Recreation, Wilderness ROS Primitive, Semi-Primitive Motorized, Semi-Primitive Non-Motorized National Forest Shoreline Miles 157 miles National Forest Shoreline Acres 40,446 acres Communities None Alaska Coastal Management Act Portions fall within the Juneau District Coastal Management Program.			
<u>Forest Service Facilities</u> None			
<u>Non-National Forest System Lands</u> None			
<u>Recreation Use</u> Area Attractions Scenic view and glaciers Commercial Use Kayak camping, goat and bear hunting, nature tours, and sightseeing Non-commercial Use Sightseeing, camping, kayaking, hiking, fishing, hunting, wildlife viewing, and photography Use Patterns There is a high amount of cruise ship traffic that enters Tracy Arm to view the North and South Sawyer Glaciers. This area is also popular for kayakers. Endicott Arm receives higher levels of commercial fishing use than Tracy Arm, and has been a less-frequented destination for recreationists, although use is increasing. Commercial crab pots are stored in numerous places in Endicott Arm. Primary Use Areas Various sites along Tracy Arm			

Use Area 01-05D

Tracy Arm – Juneau Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions on subsistence resource users.
Wildlife	While only 20 bald eagle nests have been mapped in this area, it is assumed that nests are located along the shoreline in numbers at least equal to surveyed areas to the north. Goat hunting within Tracy Arm.
Fisheries	These fiords contain extremely steep terrain providing for few streams with good fish habitat and fishing opportunities. Eight Class I streams have been mapped in this area. No streams have been identified with high fishing values.
Botany	<i>Botrychium</i> ferns were found at one beach meadow site. Five surveys were completed on one mile of shoreline.
Cultural/Heritage	Three prehistoric sites and one historic site were discovered during 16 surveys of the area that covered 4.5 miles.

Alternative Comparisons

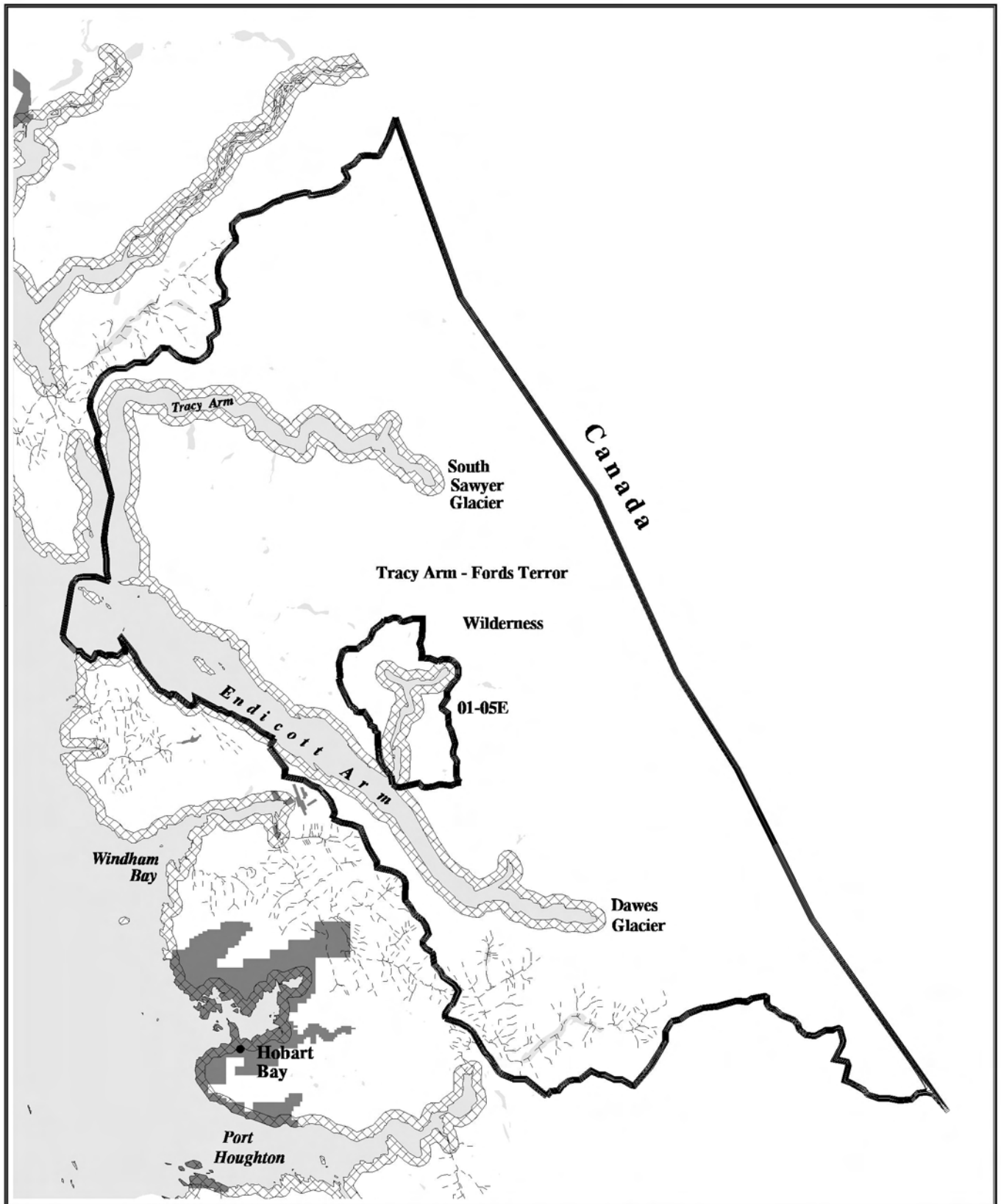
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		50	509	56	252	636	282	25	64	33	50	254	141
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Goat and other big game issues will be addressed at the annual meeting with ADF&G. If necessary, harvest restrictions will be placed on guided hunting.

Tracy Arm Use Area - 01-05D



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

0.5 1 2 Miles
Scale in Miles



USE AREA
LOCATOR

Use Area 01-05E

Fords Terror – Juneau Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
3	126	318	141
<u>Description</u> <p>This area encompasses Fords Terror, a wilderness area with unique characteristics that warrant a separate unit designation. Fords Terror is small fiord of Endicott Arm and has steep rock walls that can amplify and echo sounds.</p> <p>LUDs Wilderness</p> <p>ROS Primitive and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 22 miles</p> <p>National Forest Shoreline Acres 6,652 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>None</p>			
<u>Recreation Use</u> <p>Area Attractions Scenic views</p> <p>Commercial Use Kayak camping tours and day use</p> <p>Non-commercial Use Kayaking and kayak camping</p> <p>Use Patterns There are six identified campsites in the area managed in a ‘rest-rotation’ schedule to minimize site impacts. Campsite ‘T’ is one of the two most heavily used sites in Fords Terror. The other occurs on the west shore just before the narrows, a potentially dangerous passage of swirling water at high and low tides, hence the area's name. Because of narrow access and unpredictable currents at running tides, this is not a high use area.</p> <p>Primary Use Areas Six campsites within this use area, with the site at the ‘T’ receiving the most use</p>			

Use Area 01-05E

Fords Terror – Juneau Ranger District

Potential Areas for Large Group Use

None identified

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

No issues or concerns

Fisheries

No high value fishing streams identified.

Botany

There are no known sensitive plants. This area has not received intensive surveys. Beach meadows and camping spots may be sensitive to recreation use.

Cultural/Heritage

There are no known sites. This area has not been intensively surveyed.

Alternative Comparisons

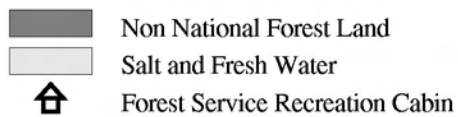
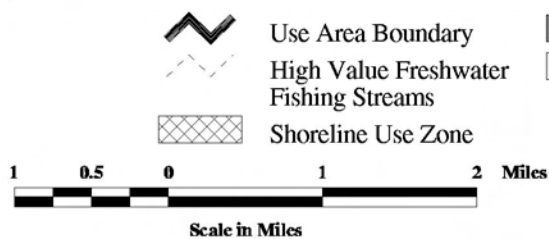
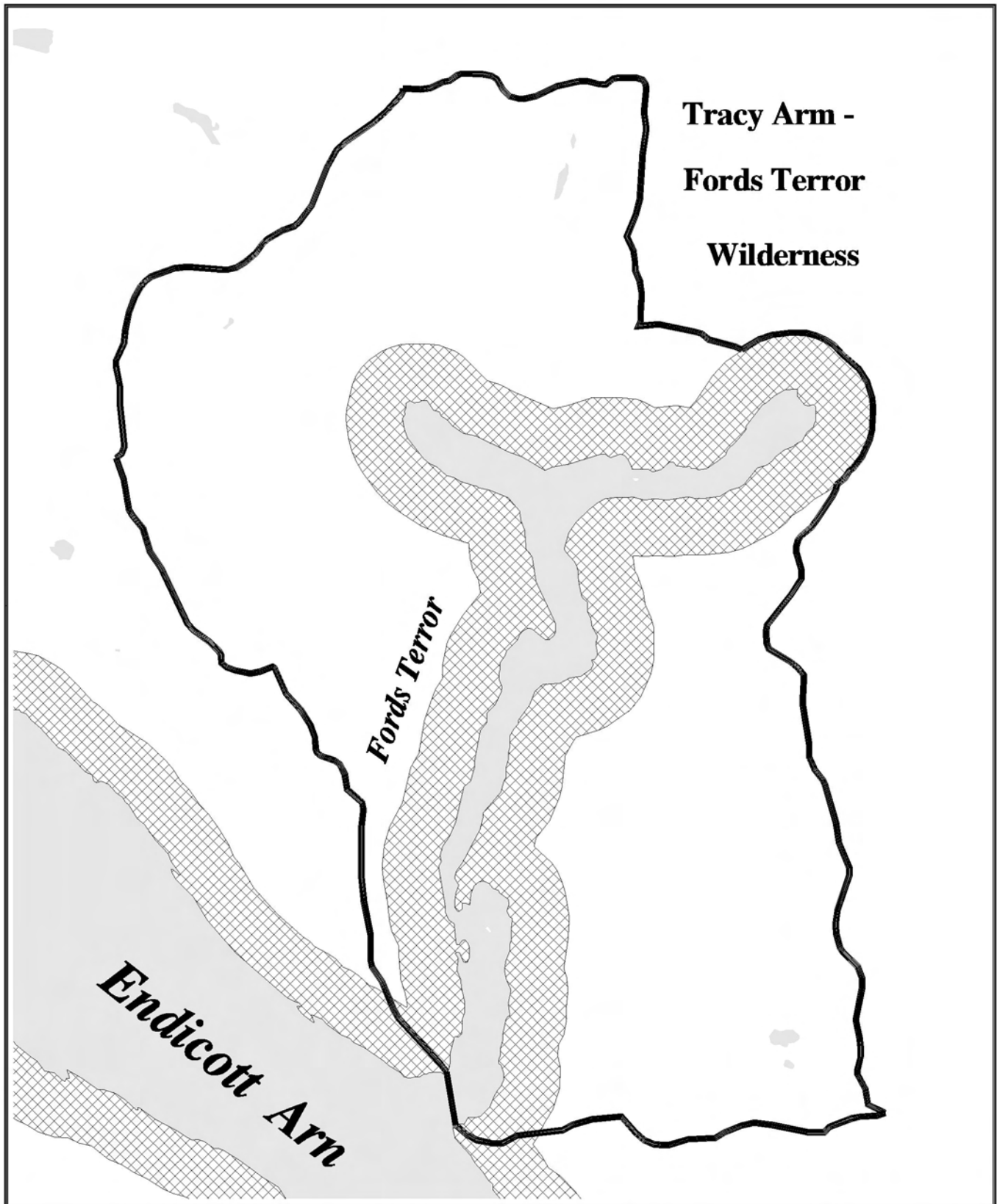
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		13	127	14	63	159	71	15	33	15	13	60	35
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

In Fords Terror, guided use will be limited to using a single site for no more than two consecutive nights. Only two camping sites, “Middle T” and “North Narrows”, will be available for group sizes larger than six people.

Fords Terror
Use Area - 01-05E



Use Area 04-01A

Gut Bay (Southeast Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
8	336	848	376
<u>Description</u> <p>This use area, on southeastern Baranof Island, extends from south of Warm Springs Bay to the mouth of Patterson Bay including the eastern portion of the South Baranof Wilderness. This use area is characterized by stretches of inaccessible coastline adjacent to Chatham Strait with numerous small bays and coves. Four large bays (Red Bluff, Hoggatt, Gut, and Patterson) provide reliable anchorages and good access to the uplands.</p> <p>LUDs Wilderness and Remote Recreation</p> <p>ROS Primitive and Semi-Primitive Motorized</p> <p>National Forest Shoreline Miles 123 miles</p> <p>National Forest Shoreline Acres 29,818 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Sitka District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>None</p>			
<u>Recreation Use</u> <p>Area Attractions Brown bear hunting, freshwater fishing, hiking, sightseeing</p> <p>Commercial Use Brown bear hunting, freshwater fishing, hiking, sightseeing</p> <p>Non-commercial Use Most non-commercial use is transient boaters, especially on the uplands adjacent to the area's protected bays.</p> <p>Use Patterns Commercial trollers and crabbers; boat based commercial outfitter/guides and recreational boaters.</p> <p>Primary Use Areas Red Bluff Bay is a popular anchorage for boats transiting Chatham Strait and is a convenient anchorage for people accessing Falls Lake. Patterson and Gut Bays are also used.</p>			

Use Area 04-01A

Gut Bay (Southeast Baranof) – Sitka Ranger District

Management/Resource Considerations

<i>Subsistence</i>	Gut Bay and Falls Lake support subsistence sockeye fisheries for the community of Kake. There are no anticipated restrictions on subsistence resource uses as a result of this project.
<i>Wildlife</i>	One NFMS identified Steller sea lion haul-out is located in this use area. Although not mapped, bald eagle nests are presumed to exist in similar numbers found in surveyed areas to the north of this GUA. Harbor seal haul outs.
<i>Fisheries</i>	Fifty-nine Class I streams have been mapped in this area. Three streams were identified with high fishing potential. Two of these, Gut Bay and Falls Lake, are subsistence sockeye systems. Gut Bay and Falls Lake support subsistence sockeye fisheries for the community of Kake. Due to possible declines in escapement, the Federal Subsistence Board recently closed sport fishing for sockeye in these systems, to protect the subsistence fishing priority. An important stream enters at the head of Gut Bay, which produces a large number of pink salmon and Dolly Varden char. See Appendix C, Mitigation Measures.
<i>Botany</i>	Two botanical surveys have been completed on one-half mile of shoreline within this GUA with no rare or sensitive plants found.
<i>Cultural/Heritage</i>	Eight surveys have been completed in this area covering 3.5 miles. Three historic sites have been identified.

Alternative Comparisons

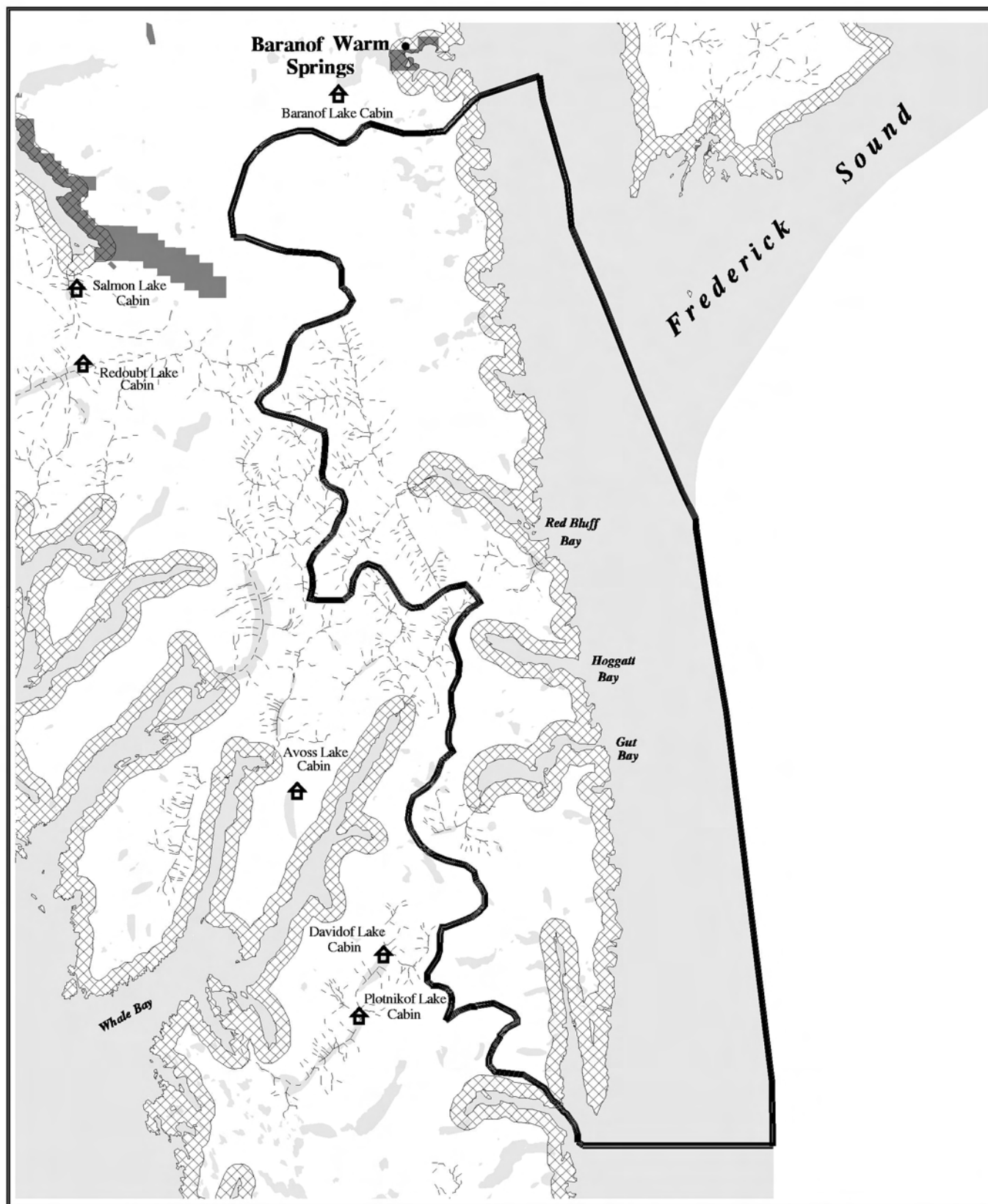
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		34	339	38	168	424	188	19	80	37	34	339	94
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Guided fishing use is prohibited during the subsistence sockeye fishery at Gut Bay and Falls Lake.

Gut Bay Use Area - 04-01A



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR



Use Area 04-01B

Port Armstrong (Southeastern Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
7	294	742	329
<u>Description</u> <p>This use area is located on southeastern Baranof Island, extending from the mouth of Patterson Bay to Cape Ommaney, then north along the west side of the island including Larch Bay. Much of the outer coastline and coastline adjacent to Chatham Strait is inaccessible. Numerous small bays and coves are accessible depending on weather conditions. A number of large bays including Deep Cove, Port Herbert, Port Walter, Port Lucy, Port Armstrong, John Bay, and Port Conclusion provide anchorages and good access to the uplands.</p> <p>LUDs Remote Recreation and Semi-Remote Recreation</p> <p>ROS Primitive and Semi-Primitive Motorized</p> <p>National Forest Shoreline Miles 134 miles</p> <p>National Forest Shoreline Acres 25,747 acres</p> <p>Communities The small community of Port Alexander is located within this use area.</p> <p>Alaska Coastal Management Act Excluding Port Alexander, this use area is within the boundary of the Sitka District Coastal Management Program.</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>Private land is found near the communities of Port Armstrong and Port Alexander. State land surrounds the private holdings within the small community of Port Alexander. Private land with a cabin is located at the head of Port Conclusion. Northern Southeast Regional Aquaculture Association has active fisheries development projects Deer Lake and Mist Cove. A National Marine Fisheries Service hatchery and permanent housing are located at Little Port Walter.</p>			
<u>Recreation Use</u> <p>Area Attractions Port Alexander, Port Armstrong, Little Port Walter, and Mist Cove</p> <p>Commercial Use Brown bear hunting, freshwater fishing, and hiking, and operators of several lodges in Port Alexander are permitted for guiding on National Forest System land.</p> <p>Non-commercial Use There is substantial non-commercial use from the local communities listed above.</p> <p>Use Patterns Boat based commercial outfitter/guides, commercial fishing and recreational boating</p> <p>Primary Use Areas Mist Cove</p> <p>Areas of Concern Trail to Deer Lake from Mist Cove is very scenic with falls but trail is currently closed for public use because of safety concerns. Sashin Lake trail is also currently closed for safety reasons.</p>			

Use Area 04-01B

Port Armstrong (Southeastern Baranof) – Sitka Ranger District

Management/Resource Considerations

Subsistence

No anticipated restrictions on subsistence resource users.

Wildlife

Two NMFS-identified Steller sea lion haul-outs located in this area. Although there are only 10-mapped bald eagle nests, it is assumed that nests are located along the shoreline in numbers at least equal to surveyed areas to the north.

Fisheries

South Baranof Island is a relatively narrow mountainous region favoring shorter steeper streams. While over 100 Class I streams have been mapped in this area, the larger fish bearing streams are absent. However, several lakes with good sport fishing opportunities are found within the project area. Betty and Jetty Lakes drain into Port Armstrong and contain good populations of rainbow trout. The Sashin Lake and Creek system empties into Little Port Walter and is an important fisheries research area for the adjacent NMFS station. Deer Lake has a coho-rearing project run by NSRAA.

Botany

Four botanical surveys have been done covering about ¾ mile of the shoreline in this use area. *Mimulus lewisii* was found on a beach meadow site in Deep Cove.

Cultural/Heritage

A total of 78 cultural surveys covering 28 miles have been completed, with 6 historical sites identified within this use area. Old cannery site in Port Walter is a concern

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		29	297	33	147	371	165	27	68	16	29	297	82
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

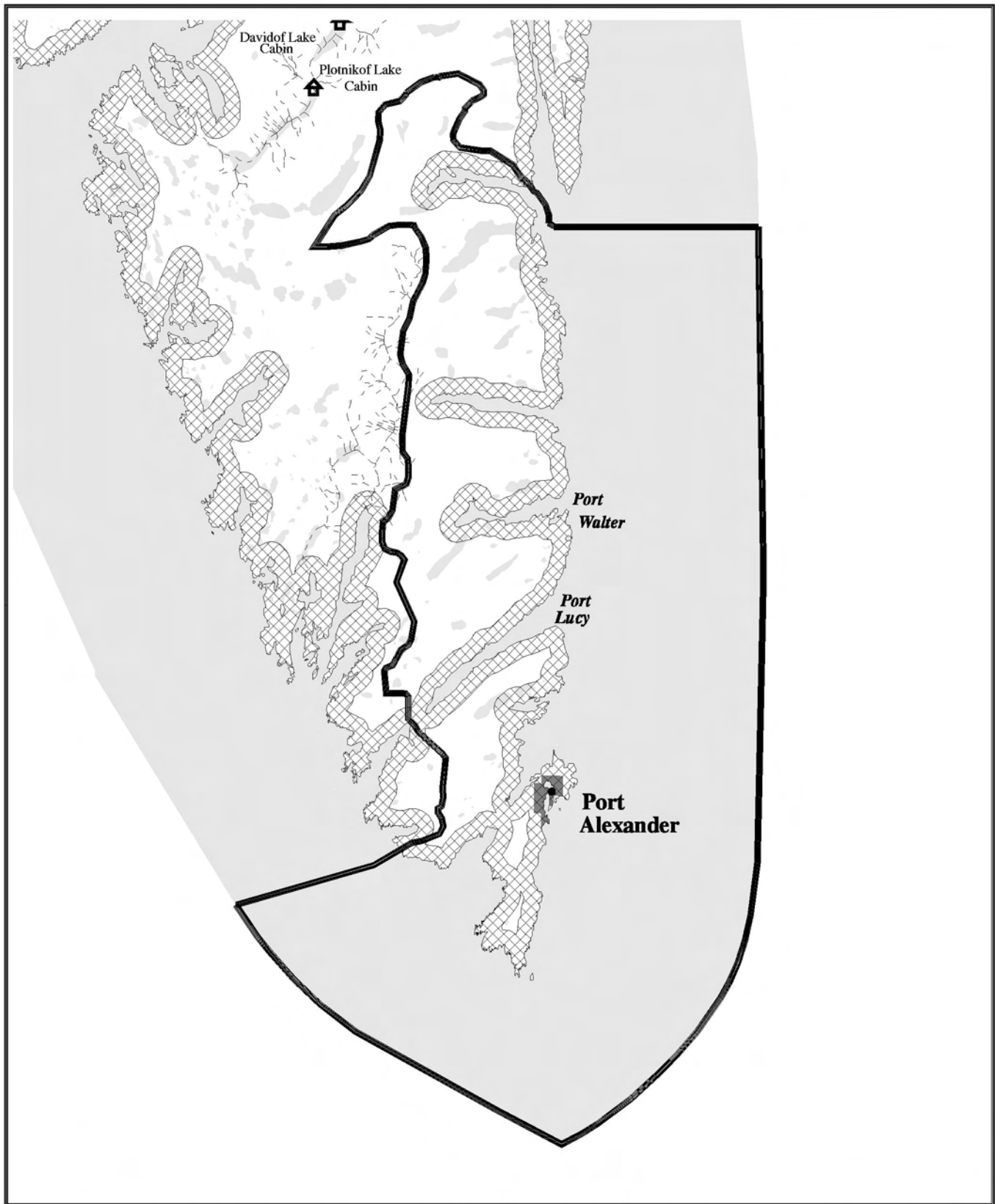
See Appendix C for mitigation measures.

Guided use of Mist Cove/Deer Lake trail and the Little Port Walter/Sashin Lake trail will not be permitted until the trails are reconstructed.

Guided hunting will not be permitted within one mile of the community of Port Alexander.

No guided use will be permitted at the Port Walter cannery site or other eligible cultural sites.

Port Armstrong Use Area - 04-01B



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

1 0.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR



Use Area 04-02A

Redoubt Lake (Central Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area is located on the southwestern portion of Baranof Island and extending from south of Three Entrance Bay to north of President Bay including a number of smaller offshore islands. The outer coast of this use area is swept by ocean swell and largely inaccessible. However, some areas provide protected access to the uplands such as Redoubt, Kanga, Big, and Seven Fathom Bays. While boaters traveling to these areas will be exposed to ocean swell, much of the travel route is in the relatively sheltered water behind offshore islands.</p> <p>LUDs Modified Landscape, Old Growth, and Semi-Remote Recreation</p> <p>ROS Primitive, Roaded Modified, Semi-Primitive Motorized, Semi-Primitive Non-motorized, and Roaded Natural</p> <p>National Forest Shoreline Miles 26 miles</p> <p>National Forest Shoreline Acres 15,942 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Sitka District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Redoubt Lake, Kanga, and Seven Fathom</p> <p>Trails Salmon Lake/Redoubt Trail</p>			
<u>Non-National Forest System Lands</u> <p>The unified City and Borough of Sitka manage several hot spring bath-houses at Goddard on city and borough property, and a trail that runs from Goddard to the west end of Redoubt Lake. Goddard is a popular destination for residents of Sitka. There are also several private parcels of land at Goddard, as well as a tract of state select land. There are two parcels of encumbered Native Allotment claims, near Kizuchia Creek, and two Regional Corporation selections at the outlet of Redoubt Lake. State select lands associated with an air navigation facility are found on Biorka Island.</p>			
<u>Recreation Use</u> <p>Area Attractions Goddard Hot Springs (private), Forest Service recreation cabins, several sandy beaches popular for picnicking, and subsistence sockeye fishery at Redoubt Lake</p> <p>Commercial Use Brown bear hunting, camping, sightseeing, and picnicking</p> <p>Non-commercial Use Salmon fishing, hot springs, and hiking</p> <p>Use Patterns The entire area is popular with residents of Sitka for recreation, subsistence uses, and commercial fishing.</p> <p>Primary Use Areas Biorka Island, Redoubt Bay, Goddard, Big Bay, and Seven Fathom Bay</p>			

Use Area 04-02A

Redoubt Lake (Central Baranof) – Sitka Ranger District

Management/Resource Considerations

<i>Subsistence</i>	Redoubt Lake has a subsistence sockeye fisheries used by the residents of Sitka. There are no anticipated restrictions on subsistence resource users as a result of this project.
<i>Wildlife</i>	Two NMFS identified Steller sea lion haul-outs and 30 mapped bald eagle nests are located within this use area.
<i>Fisheries</i>	In this use area, 13 Class I streams and two high value streams have been mapped. Redoubt Lake is the largest producer of sockeye salmon for subsistence uses for Sitka. Guided fishing is not allowed at Redoubt Lake during the personal use sockeye fishery.
<i>Botany</i>	One survey covering ¼-mile of shoreline was completed with no rare or sensitive plants found.
<i>Cultural/Heritage</i>	Nine surveys covering 2.5 miles revealed six historic and two prehistoric sites.

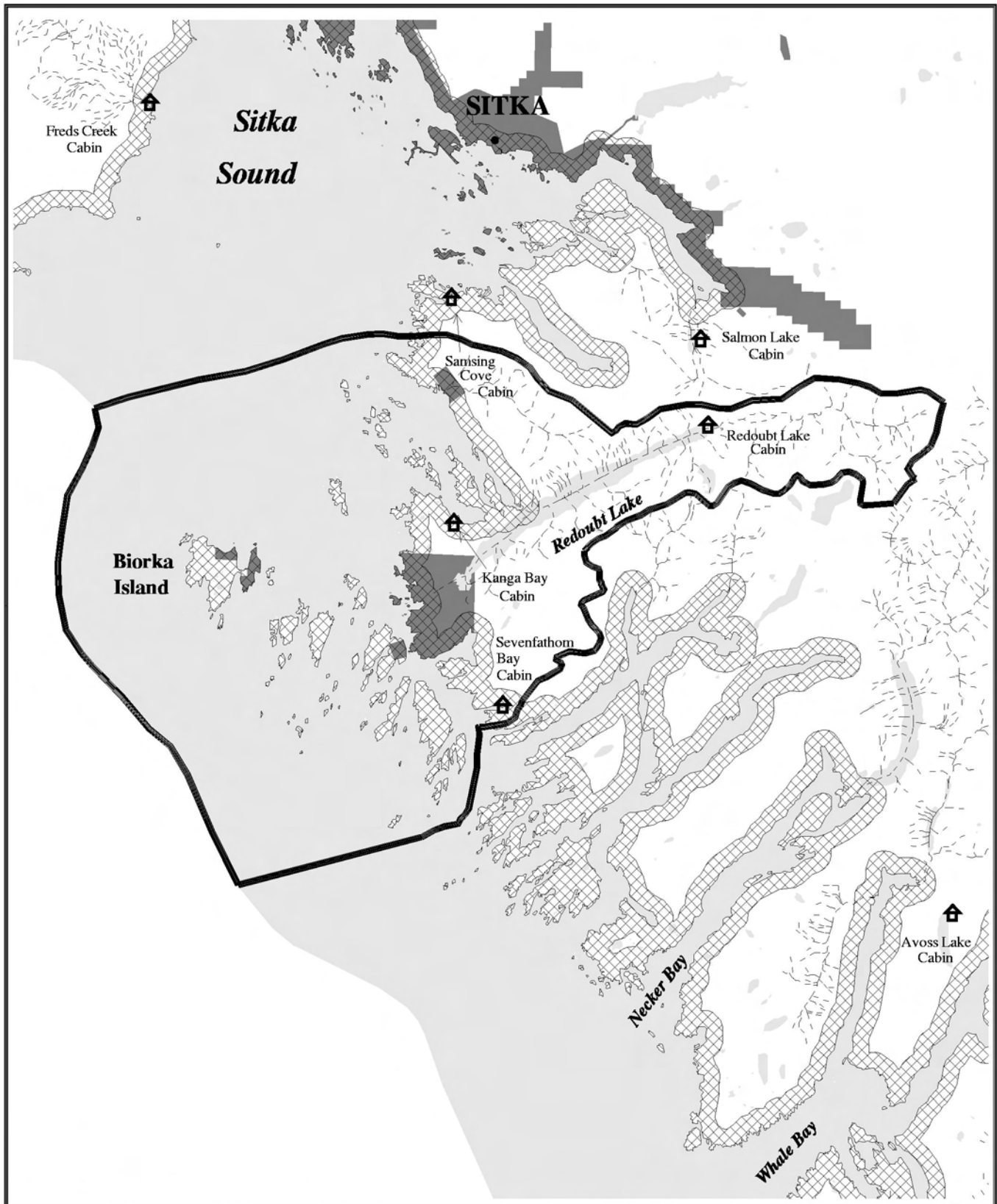
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	254	28	126	318	141	15	32	15	25	106	71
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Redoubt Lake Use Area - 04-02A



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

1 0.5 0 1 2 Miles



Scale in Miles



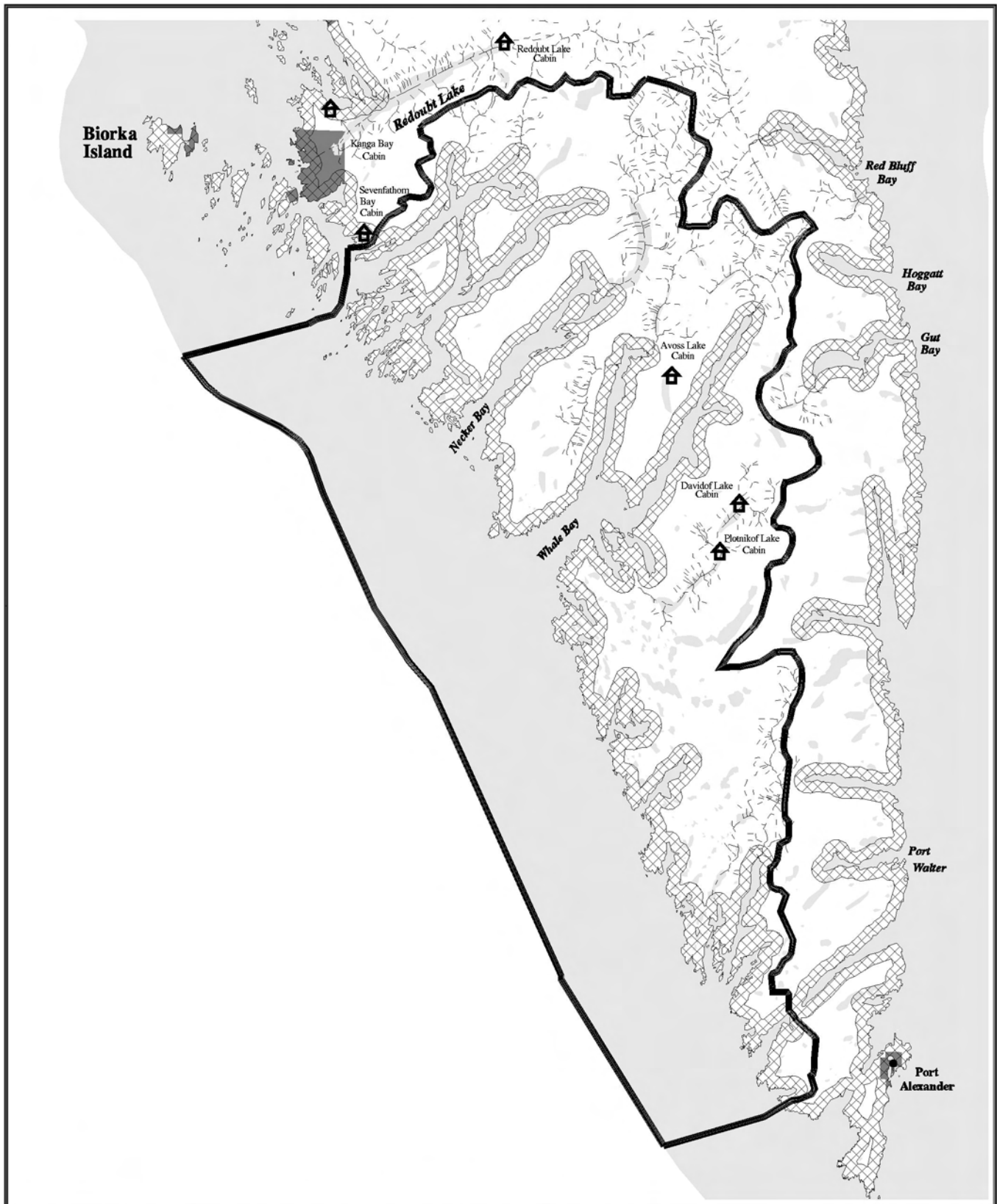
USE AREA
LOCATOR

Use Area 04-02B

Whale Bay (Southwest Baranof) – Sitka Ranger District

Recreation Carrying Capacity (total capacity for all users)			
Groups at one time	Spring	Summer	Fall
18	756	1,908	846
Description			
Located on the southwestern portion of Baranof Island, this use area extends from north of President Bay, to south of Little Puffin Bay including a number of offshore islands and the western portion of the South Baranof Wilderness. The analysis area is characterized by an inaccessible outer coast with bays providing protected access to the uplands including: President, Necker, Whale, Sandy, Snipe, Byron, Red Fish, Little Branch, Puffin and Little Puffin Bays, and both Crawfish and West Crawfish Inlets.			
LUDs	Remote Recreation and Wilderness		
ROS	Primitive, Semi-Primitive Motorized, and Semi-Primitive Non-motorized		
National Forest Shoreline Miles	525 miles		
National Forest Shoreline Acres	82,909 acres		
Communities	None		
Alaska Coastal Management Act	Sitka District Coastal Management Program		
Forest Service Facilities			
Public Recreation Cabins	One cabin each is located near the shores of Davidof Lake, Plotnikof Lake and Avoss Lake, however these cabins are each located more than a mile inland from the saltwater shoreline.		
Trails	Trail from Davidof Lake to Plotnikof Lake		
Non-National Forest System Lands			
All the land within this use area is National Forest System land. An outfitter/guide operates a tent camp in Rakavoi Bay during the summer months.			
Recreation Use			
Area Attractions	Hunting, sport and subsistence fishing, Forest Service recreation cabins, remote recreation and scenic values		
Commercial Use	Camping, brown bear and goat hunting, freshwater fishing, hiking, picnicking, and Rakavoi/Whale Bay outfitter/guide summer camp		
Non-commercial Use	The northern reaches of this area receive use by residents and visitors from Sitka. Offshore islands provide a protected water route to Necker Bay. Beyond Necker Bay small skiff travel is determined by sea conditions and recreational use in the southern reaches of the use area is sporadic. Of particular importance to residents are the Special Management Areas listed in the Sitka Coastal Zone Management Plan.		

Whale Bay Use Area - 04-02B



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 04-03

Sitka Area (West Central Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
40	1,680	4,240	1,880
<u>Description</u> <p>This use area includes a small portion of the West Chichagof – Yakobi Wilderness (along the north shore of Salisbury Sound) and the following islands: Kruzof, Partofshikof, Halleck, Krestof, northwest Baranof, and the Siginaka Islands from north of Fish Bay to south of Three Entrance Bay. A Special Interest Area, Mount Edgecumbe Geological Area, is also found in this use area. Much of the shoreline is protected and provides easy access to uplands in numerous bays, sounds, and straits. The outer coastline along Kruzof Island’s western shore is relatively inaccessible from the water.</p> <p>LUDs Modified Landscape, Old Growth, Remote Recreation, Special Interest, Semi-Remote Recreation, Scenic Viewshed, and Timber Production, and Wilderness</p> <p>ROS Primitive, Roaded Modified, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-motorized</p> <p>National Forest Shoreline Miles 417 miles</p> <p>National Forest Shoreline Acres 76,413 acres</p> <p>Communities The community of Sitka is located within this use area.</p> <p>Alaska Coastal Management Act Portions of the area are covered under the Sitka District Coastal Management Program and amendments under the City and Borough of Sitka Parks and Recreation Plan.</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Cabins are located at Brent’s Beach, Fred’s Creek, Shelikof Bay, North Beach, Allan Point, Piper Island, Salmon Lake, Samsing, and Suloia Lake; however, the cabins at Suloia and Salmon Lakes are located more than a mile inland from the saltwater shoreline.</p> <p>Special Use Cabins There are three private recreation cabins on National Forest System lands under special use permit: two in Birdsnest Bay and one in Sukoi Inlet.</p> <p>Shelters Neva, Kakul, Mud Bay and Mt. Edgecumbe</p> <p>Trails Mt. Edgecumbe Trail is a National Recreation Trail that leads to the top of Mt. Edgecumbe. There is a trail from Silver Bay past Salmon Lake to Redoubt Lake. There are also several road systems accessible only by water that are used as hiking and ATV trails, including: Mud Bay to Shelikof Bay and North Beach, Eagle River, Nakwasina, and Saint John Baptist Bay.</p>			
<u>Non-National Forest System Lands</u> <p>There are numerous tracts of non-National Forest System lands within the area, including private and municipal lands within the City and Borough of Sitka; Native Corporation lands at Katlian Bay, Krugloi Point, and Sealion Cove; state lands at Port Krestof, Lisianski Peninsula, Kalinin Bay, Starrigavan, Silver Bay, and the Magoun Islands; and private lands at Dog Point, and on the islands of Sitka Sound. In addition, there are encumbered lands involving Native Allotment Claims at St. John Baptist Bay, Nakwasina Sound, and Sinitsin Cove.</p>			

Use Area 04-03

Sitka Area (West Central Baranof) – Sitka Ranger District

Recreation Use

Area Attractions	Forest Service cabins, hiking trails, fishing, hunting, scenic views, and old growth forest
Commercial Use	Brown bear hunting, camping, freshwater fishing, goat hunting, hiking, picnicking, and sightseeing
Non-commercial Use	This use area is easily accessible and is popular with residents and non-guided visitors from Sitka. Of particular importance to residents, are the destinations listed as Special Management Areas in the Sitka Coastal Zone Management Plan.
Use Patterns	Both residents and non-residents use the entire area. Residents disperse and use accessible uplands along the many miles of protected shoreline.
Primary Use Areas	The most heavily used areas include all of the Sitka Accessible sites and the Kruzof road system.

Management/Resource Considerations

Subsistence	There are several stream systems that are important for subsistence users from Sitka. An annual average of 25 subsistence-fishing permits were returned for use at Salmon Lake, Neva Creek, and Aleutkina Bay. There are no anticipated restrictions on subsistence resource users as a result of this project.
Wildlife	NMFS has identified two Steller sea lion haul outs in this use area. There also are 192 mapped bald eagle nests.
Fisheries	This use area receives extensive use by subsistence, sport and commercial fishers. There are at least 14 major anadromous streams with high freshwater fishing values. These systems support returns of coho, chum, and pink salmon. Dolly Varden char are abundant in many systems. Some Sitka subsistence fishers have concerns about the diminished returns of coho salmon to streams near Sitka and the increase in guided and unguided sport fishing. Though guided freshwater sport fishing on Forest Service lands has not dramatically increased in recent years, saltwater use may explain some of the local crowding concerns. Most of the sport fishing effort in the Sitka area occurs on saltwater. Salmon Lake has a small run of sockeye salmon, which is protected by ADF&G fishing restrictions.
Botany	Six surveys were conducted. <i>Romanzoffia unalaschensis</i> was identified adjacent to a stream.
Cultural/Heritage	Sixteen historic and 37 prehistoric sites were identified from 76 surveys covering 76.5 miles.

Use Area 04-03

Sitka Area (West Central Baranof) – Sitka Ranger District

Alternative Comparisons

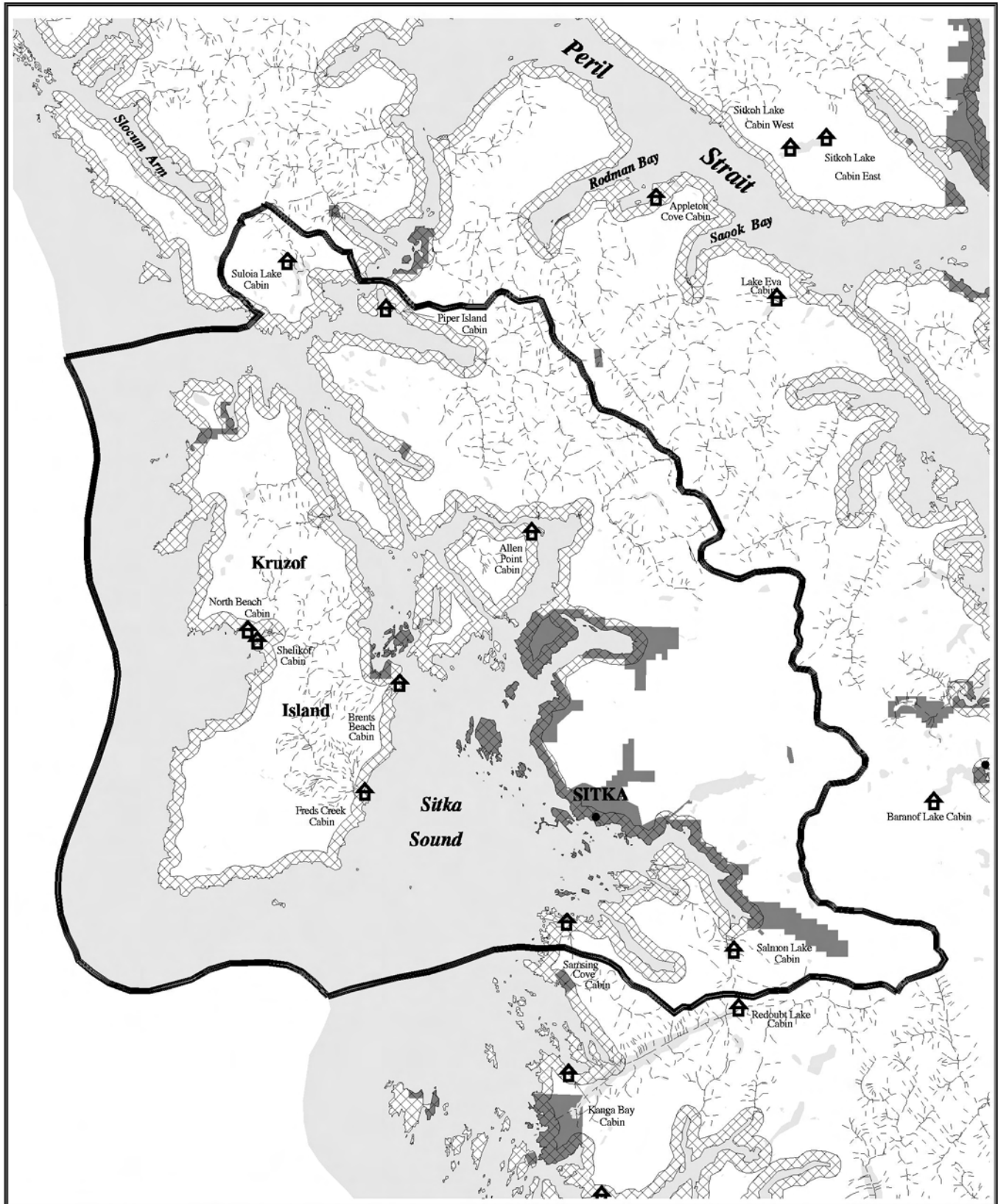
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		168	424	188	840	2,120	940	84	212	94	470	1187	526
Enclaves	N/A	None			Eagle River Road			None			Eagle River Road		
					Dry Pass								
					Noxon								
15% Areas	N/A	None			Nadezhda			None			None		
					Fish Bay								

Mitigation

See Appendix C for mitigation measures.

Sitka Area

Use Area - 04-03



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



USE AREA
LOCATOR

10.50 1 2 Miles
Scale in Miles

Use Area 04-04A

Lake Eva, Rodman Bay (North Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
8	336	848	376
<u>Description</u> <p>This use area is located on the northern end of Baranof Island extending from just west of Peschani Point, to just east of the Lake Eva trail. Shoreline access is dictated by weather conditions (north Baranof Island/Peril Strait) and by easily accessed shoreline in the areas few bays: Rodman Bay, Appleton Cove, Saook Bay, and Hanus Bay.</p> <p>LUDs Modified Landscape, Old Growth, Semi-Remote Recreation, Scenic Viewshed, and Timber Production</p> <p>ROS Roaded Modified, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 53 miles</p> <p>National Forest Shoreline Acres 13,457 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Sitka District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Appleton Cove and Lake Eva. The Lake Eva cabin is located more than a mile inland from the saltwater shoreline.</p> <p>Trail Lake Eva Trail</p>			
<u>Non-National Forest System Lands</u> <p>A floating lodge has been proposed in the adjacent Use Area at the False Island Bight. If the lodge becomes active and guiding activities occur, it is anticipated that the clientele would also utilize the uplands of this use area. A parcel of private land, associated with a patented mining claim, is located on the southern shore of Rodman Bay.</p>			
<u>Recreation Use</u> <p>Area Attractions Recreation cabins, Lake Eva Trail, wildlife and salmon viewing, old growth forest and opportunities for viewing large stand of trees</p> <p>Commercial Use Brown bear hunting, freshwater fishing, and hiking by mid-size cruise ship tours</p> <p>Non-commercial Use Hunting, freshwater fishing, and sightseeing</p> <p>Use Patterns This use area is important to the residents of Sitka. Travel to this area from Sitka is through protected waterways that can be traveled in most weather conditions. Due to its proximity to the most traveled water route to Sitka, the area receives a fair amount of unguided use by transient boaters.</p> <p>Primary Use Areas Rodman Bay, Appleton Cove, Hanus Bay, and Saook Bay are use areas. The Lake Eva trail receives heavy use by sockeye subsistence fishermen and from boat-based outfitter/guides.</p> <p>Areas of Concern Lake Eva trail receives heavy use.</p>			

Use Area 04-04A

Lake Eva, Rodman Bay (North Baranof) – Sitka Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, 73 bald eagle nests have been mapped.

Fisheries

Twenty-one Class I streams have been mapped, five of which are high value fishing streams. Large runs of pink and chum salmon, and anadromous Dolly Varden char return to these streams in addition to the resident populations of Dolly Varden char. The Lake Eva system supports sockeye, coho, and pink salmon, steelhead, cutthroat, and Dolly Varden char. Steelhead and sockeye runs are relatively small. Lake Eva sockeye are a subsistence resource for the village of Angoon and to a lesser degree for Sitka.

Botany

Four botanical surveys have been completed covering about 1.5 miles of shoreline in close proximity to the outlet stream from Lake Eva. No rare or sensitive plants were found.

Cultural/Heritage

One historic and seven prehistoric sites have been identified in this area from 17 surveys covering 41.5 miles.

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		34	339	38	168	424	188	33	175	19	34	339	94
<i>Enclaves</i>	N/A	None			Point Elizabeth						Point Elizabeth		
					Rodman Bay			Rodman Bay			Rodman Bay		
					Saook Bay						Saook Bay		
					Lake Eva Trail			Lake Eva Trail			Lake Eva Trail		
<i>15% Areas</i>	N/A	None			Duffield			None			None		

Mitigation

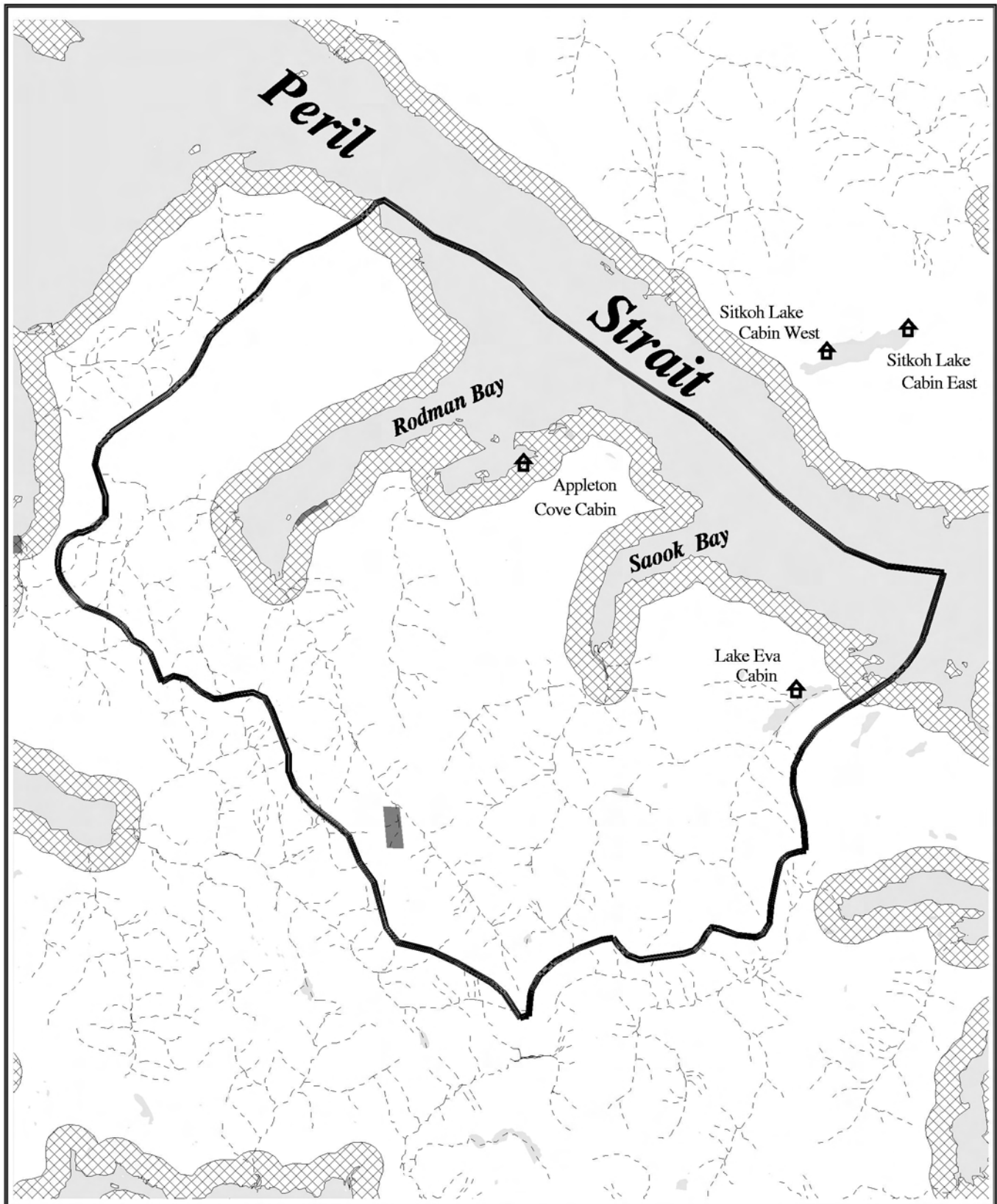
See Appendix C for mitigation measures.

Outfitter Guides will not be permitted to fly clients into Lake Eva.

Lake Eva trail will need to be reconstructed before additional guided use is permitted.

Lake Eva, Rodman Bay

Use Area - 04-04A



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin



USE AREA
LOCATOR

1 0.5 0 1 2 Miles



Scale in Miles

Use Area 04-04B

Kelp Bay (Northeast Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
9	378	954	423
<u>Description</u>			
Located on the northern end of Baranof Island, this use area extends from east of the Lake Eva Trail, to south of Takatz Bay including Catherine Island, smaller islands in the vicinity of Catherine Island, and the islands within Kelp Bay. A Special Designation Area, Glacial River Wild River, is located within this use area. Access to shoreline is dictated by weather conditions particularly along Peril Strait and Chatham Strait. Easily accessible shoreline is located in Hanus Bay, Cosmos Cove, Kasnyku Bay, Takatz Bay, and the large bay complex of Kelp Bay. It is a scenic area. Glacier River is an eligible Wild River.			
LUDs	Old-growth Habitat, Semi-Remote Recreation, Remote Recreation, Scenic Viewshed, Timber Production, Modified Landscape, and Wild River		
ROS	Roaded Modified, Primitive, Semi-Primitive Motorized, Semi-Primitive Non-motorized) and Rural		
National Forest Shoreline Miles	157 miles		
National Forest Shoreline Acres	29,867 acres		
Communities	None		
Alaska Coastal Management Act	Sitka District Coastal Management Program		
<u>Forest Service Facilities</u>			
Administrative Cabins	Catherine Island, at Hanus Bay		
<u>Non-National Forest System Lands</u>			
A year round hatchery operated by NSRAA is located at Hidden Falls. State select land is located at the head of Takatz Bay and surrounds Takatz Lake.			
<u>Recreation Use</u>			
Area Attractions	Scenic views, beach hiking, spawning salmon, and protected anchorage		
Commercial Use	An outfitter/guide operates a tent camp on National Forest System uplands adjacent to The Basin during the summer months. There is also brown bear hunting, camping, freshwater fishing, hiking, sightseeing, and kayaking.		
Non-commercial Use	Freshwater fishing, hiking, and hunting		
Use Patterns	This area receives some use by residents of Angoon, Sitka, and Warm Springs. Due to its proximity to major marine travel routes, a number of unguided transient boaters also use this area. There is also commercial fishing; boat and land based commercial outfitter/guide use; and recreational boaters.		
Primary Use Areas	Kelp Bay, Catherine Island, and Hidden Falls		
Areas of Concern	Glacial River is a recommended Wild River.		

Use Area 04-04B

Kelp Bay (Northeast Baranof) – Sitka Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, 248 bald eagle nests have been mapped.

Fisheries

Thirty-four Class I streams have been mapped with seven streams identified as having high freshwater fishing values. Clear and Bourbon Creeks flow into Kelp Bay and are popular fish streams with commercial and non-commercial users. Both streams are good producers of Dolly Varden char and pink salmon.

Botany

Numerous invasive weed species are found near the salmon hatchery at Hidden Falls. One botanical survey was completed covering about 0.25 miles of shoreline. No rare plants were found.

Cultural/Heritage

Twenty-eight surveys covering 73.5 miles have been completed in this area, with one historic and 15 prehistoric sites identified.

Alternative Comparisons

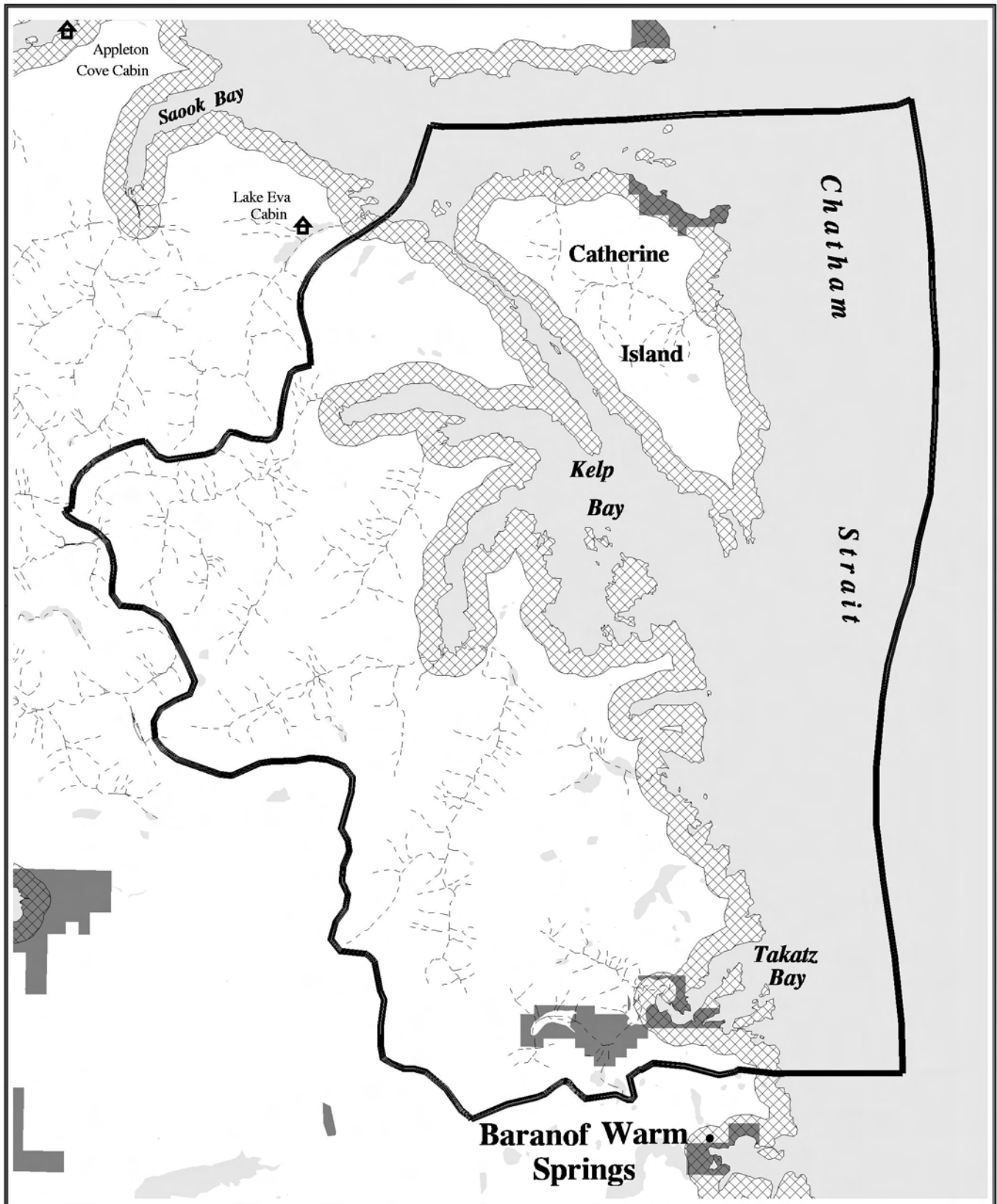
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		38	382	42	189	477	212	29	191	25	38	382	106
<i>Enclaves</i>	N/A	None			Hanus Bay						Hanus Bay		
					Portage Arm								
<i>15% Areas</i>	N/A	None			Bourbon Creek								

Mitigation

See Appendix C for mitigation measures.

Noxious weed treatment will be included in the forest noxious weed program.

Kelp Bay
Use Area - 04-04B



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water

Forest Service Recreation Cabin

1 0.5 0 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 04-04C

Baranof Warm Springs (East Baranof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
3	126	318	141
<u>Description</u> <p>This Use Area is located on the eastside of Baranof Island extending from just south of Takatz Bay to just south of Warm Springs Bay. Access to small reaches of shoreline along Chatham Strait is dictated by weather conditions. The only protected shoreline within this use area is Warm Springs Bay.</p> <p>LUDs Remote Recreation and Semi-remote Recreation</p> <p>ROS Primitive and Semi-Primitive (motorized and non-motorized)</p> <p>National Forest Shoreline Miles 10 miles</p> <p>National Forest Shoreline Acres 2,679 acres</p> <p>Communities The small community of Baranof lies within this use area.</p> <p>Alaska Coastal Management Act Sitka District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins A Forest Service public recreation cabin is located on the south shore, near the west end of Baranof Lake. However, this cabin is further than a mile inland from the saltwater shoreline.</p> <p>Trail A trail that originates on state land goes to Sadie Lake. Currently, the trail receives no maintenance.</p>			
<u>Non-National Forest System Lands</u> <p>The state of Alaska owns a dock at Warm Springs Bay. A board walk trail located on municipal and state select land runs from the state dock to the shore of Baranof Lake.</p>			
<u>Recreation Use</u> <p>Area Attractions The community of Baranof, Baranof Lake, Sadie Lake, hot springs and scenic views</p> <p>Commercial Use Guides who transit through this area offer activities such as brown bear hunting, freshwater fishing, and hiking. The owner of a lodge located on private land on the south shore of Warm Springs Bay is permitted to take clients onto surrounding National Forest System uplands for activities such as hiking and freshwater fishing.</p> <p>Non-commercial Use Warm Springs Bay is a popular anchorage for many transient boats and much of the non-guided use within the use area is by transient visitors.</p> <p>Use Patterns Commercial fishing and land and boat based outfitter/guide use</p> <p>Primary Use Areas Warm Springs Bay</p>			

Use Area 04-04C

Baranof Warm Springs (East Baranof) – Sitka Ranger District

Management/Resource Considerations

<i>Subsistence</i>	There are no anticipated restrictions on subsistence resource users as a result of this project.
<i>Wildlife</i>	Bald eagle nests are presumed to occur in numbers at least equal to surveyed areas to the north.
<i>Fisheries</i>	Two Class I streams have been mapped in the area, but no high value streams were identified. The lake system is not anadromous, but supports populations of cutthroat trout and Dolly Varden char.
<i>Botany</i>	Two surveys were completed within Warm Springs Bay with no rare or sensitive plants identified.
<i>Cultural/Heritage</i>	One survey covering 0.5 miles has been completed with one site identified.

Alternative Comparisons

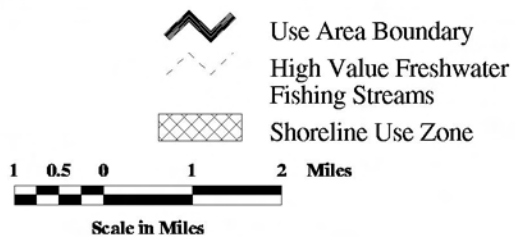
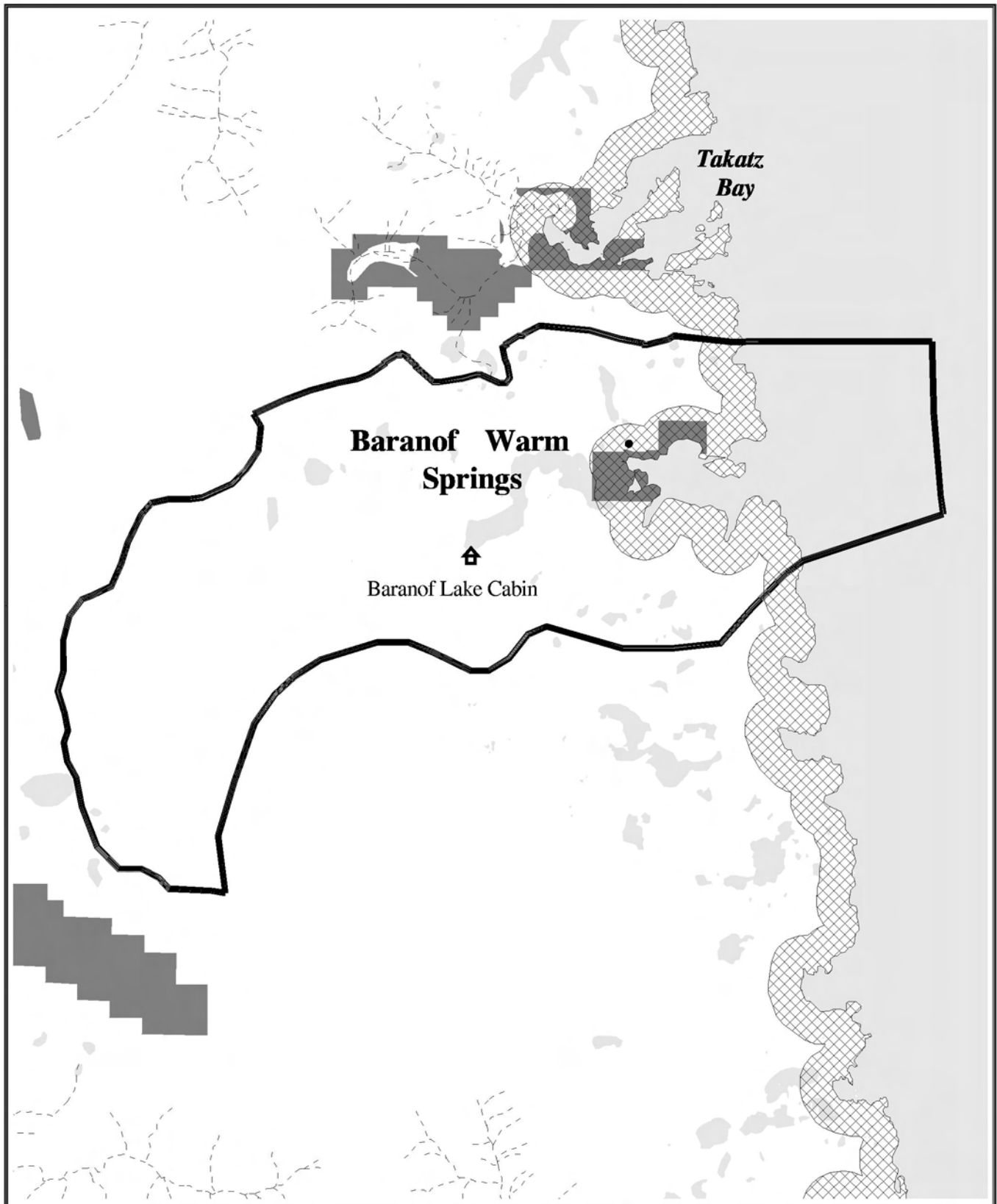
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		13	127	14	63	159	71	15	30	15	13	127	35
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Baranof Warm Springs

Use Area - 04-04C



USE AREA
LOCATOR

Use Area 04-05

Southwest Admiralty – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<p><u>Description</u></p> <p>This use area is on Admiralty National Monument and part of the Kootznoowoo Wilderness located in the southwest portion of the island extending from Hood Bay south to Pt. Gardner.</p> <p>LUDs Wilderness Monument</p> <p>ROS Primitive and Semi-Primitive Non motorized and Semi-Primitive Motorized</p> <p>National Forest Shoreline Miles 101 miles</p> <p>National Forest Shoreline Acres 24,555 acres</p> <p>Communities The community of Angoon has a population of about 750 people and is located at to the north of the Use Area.</p> <p>Alaska Coastal Management Act The Angoon Coastal Management Plan has Areas Meriting Special Attention (AMSAs) in Hood, Whitewater and Chaik Bays. Keys components of the Enforceable Policies for these AMSAs are (1) Maintaining or enhancing subsistence resource productivity and ensuring access to those resources; (2) Balancing recreational uses with the subsistence economy and culture; (3) Encouraging the involvement of local residents in the development of tourism related services and businesses. These bays receive use from the people of Angoon with Hood Bay receiving the most use due to its proximity to Angoon.</p>			
<p><u>Forest Service Facilities</u></p> <p>None</p>			
<p><u>Non-National Forest System Lands</u></p> <p>Private land is located on the north side of Hood Bay, Chaik Bay near Village Point, and Whitewater Bay at Neltushkin.</p>			
<p><u>Recreation Use</u></p> <p>Area Attractions This subunit has several large bays and estuaries. Large creeks and good beaches with access are the primary attractions. Sand Point in Whitewater Bay has a very good beach and open stand of timber. The protected “lagoons” or “salt chucks” in Whitewater and Wilson Cove offer different experiences than many other points on Admiralty Island.</p> <p>Commercial Use Freshwater fishing occurs in major streams that empty into the bays. Brown bear hunting is a popular activity. These bays also receive use from outfitter/guides who do short beach-walking excursions.</p> <p>Non-commercial Use The residents of Angoon use this area extensively for hunting, berry picking, beach walking, fishing, and firewood cutting.</p> <p>Use Patterns Most of the commercial use is of short duration with little, if any, overnight camping.</p>			

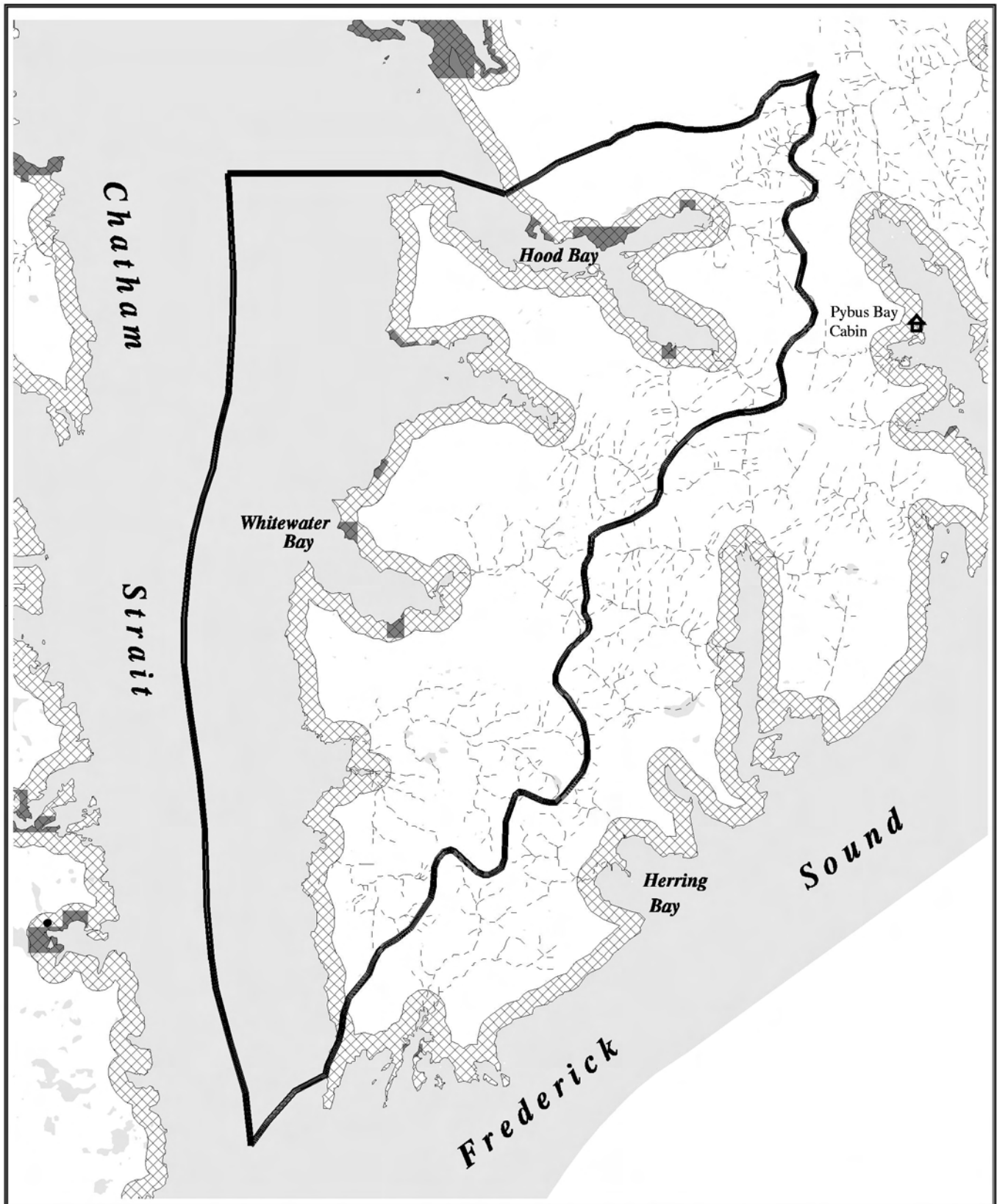
Use Area 04-05

Southwest Admiralty – Admiralty National Monument

Primary Use Areas	Hood and Chaik Bays receive more use due to their proximity to Angoon and the Whaler’s Cove Lodge.												
<u>Management/Resource Considerations</u>													
Subsistence	There are no anticipated restrictions on subsistence resource users.												
Wildlife	In this use area, 106 bald eagle nests have been mapped.												
Fisheries	In this use area, 41 Class I streams have been mapped, with nine streams of high fishing value. All are permitted for guided sport fishing activities for cutthroat trout, Dolly Varden char, and pink salmon. Clients typically practice catch and release. Two streams with high fishing values are located at the head of each bay. Chaik Bay, located approximately 20 miles south of the village of Angoon, received the majority of use. There is one high value fishing stream at the head of the arm of Chaik Bay. The stream passes through a very large meadow and inter-tidal grass flat and supports abundant runs of pink salmon and Dolly Varden char. One stream was identified with high fishing values; it empties into a salt chuck at the head of the bay and supports populations of pink, chum, and coho salmon and Dolly Varden char. Watershed restoration efforts were initiated in 1999 to restore the riparian areas and maintain stream productivity.												
Botany	No rare or sensitive plants were identified from three surveys.												
Cultural/Heritage	Two historic and 21 prehistoric sites have been identified from 35 surveys that covered 14 miles.												
<u>Alternative Comparisons</u>													
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	191	28	126	318	141	38	111	71	25	127	71
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		
<u>Mitigation</u>													
See Appendix C for mitigation measures.													

Southwest Admiralty

Use Area - 04-05



Use Area Boundary



High Value Freshwater Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

1 0.5 0 1 2 Miles



Scale in Miles



USE AREA
LOCATOR



Use Area 04-06A

Pybus Bay – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
3	126	318	141
<u>Description</u> <p>This Use Area is on Admiralty National Monument and part of the Kootznoowoo Wilderness located in the southeast portion of the island including Pybus Bay and the Brothers Islands.</p> <p>LUDs Wilderness Monument</p> <p>ROS Primitive</p> <p>National Forest Shoreline Miles 124 miles</p> <p>National Forest Shoreline Acres 18,219 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Special Use cabin in Pybus Bay</p>			
<u>Non-National Forest System Lands</u> <p>Several private parcels of land are located in Cannery Cove within Pybus Bay.</p>			
<u>Recreation Use</u> <p>Area Attractions Pybus Bay is one of the largest bays on Admiralty Island. Its numerous coves and islands provide good protection from the weather, particularly after the long crossing of Frederick Sound. Cannery Cove is the most popular anchorage in the bay. The area has large tide flats that make it popular for bear hunting, wildlife viewing, sightseeing, and whale watching. The Brothers Islands have several nice beaches and a sea lion rookery. Boats also use the area between West Brother Island and the adjacent small island to the southwest for an anchorage.</p> <p>Commercial Use Brown bear hunting, wildlife viewing, sightseeing, and beachcombing</p> <p>Non-commercial Use The residents of Kake and Petersburg use this area for bear and deer hunting, sightseeing, beachcombing, berry picking, and wildlife viewing.</p> <p>Use Patterns The presence of a lodge increases use on the saltwater. Much of the use of the Brothers Islands is associated with offshore sea lion viewing. The islands are receiving increased day and camping use, although camping is limited because of the lack of fresh water.</p>			

Use Area 04-06A

Pybus Bay – Admiralty National Monument

Management/Resource Considerations

Subsistence

Kake is the primary subsistence community that uses this area. An average of four subsistence permits have been returned for use at False Point Pybus. There are no anticipated restrictions on subsistence resource users as a result of this project.

Wildlife

NMFS has identified three Steller sea lion haul-outs in this use area. In this use area, 105 bald eagle nests are mapped.

Fisheries

In this use area, 20 Class I streams have been mapped, of which six streams have high fishing values. The creek in Donkey Bay supports pink, chum, and coho salmon, cutthroat trout, and Dolly Varden char.

Botany

There are no known sensitive plants. This area has not received intensive surveys.

Cultural/Heritage

Four historic and four prehistoric sites have been identified from 14 surveys that covered 8.5 miles.

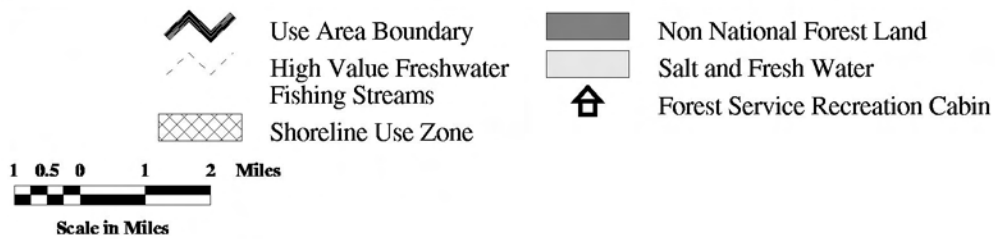
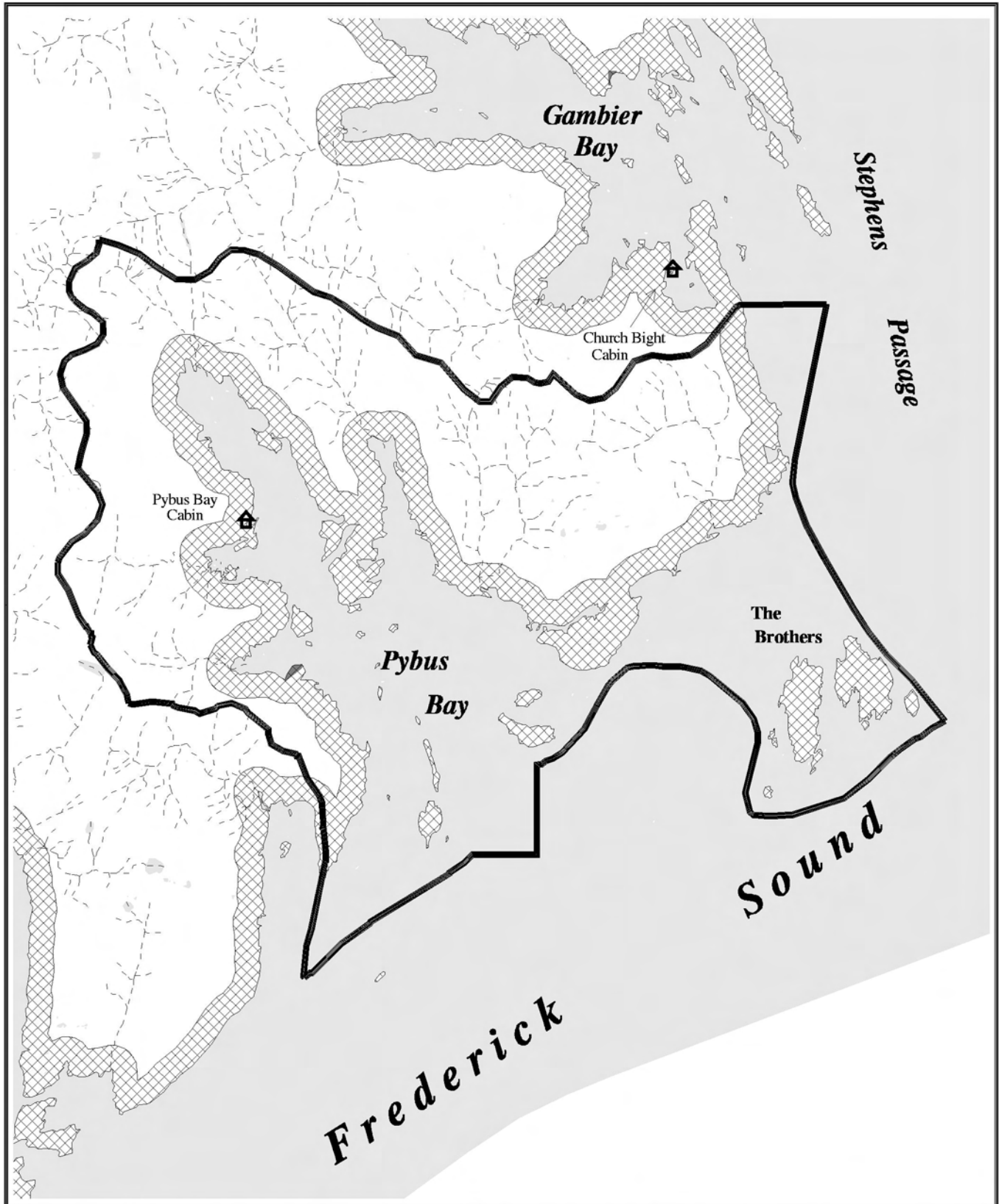
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		13	127	14	63	159	71	19	111	15	13	127	35
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Pybus Bay
Use Area - 04-06A



Use Area 04-06B

Eliza Harbor – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
3	126	318	141
<u>Description</u> <p>This use area is on Admiralty National Monument and part of the Kootznoowoo Wilderness. This area is located in the southeast portion of the island and includes one large bay, Eliza Harbor, and several small bays such as Little Pybus Bay, Chapin Bay, Herring Bay, Murder Cove, and Surprise Harbor.</p> <p>LUDs Wilderness Monument</p> <p>ROS Primitive, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 100 miles</p> <p>National Forest Shoreline Acres 19,693 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>There is one private parcel of land and an associated lodge in Tyee.</p>			
<u>Recreation Use</u> <p>Area Attractions Deepwater Point on the east side of Woewodski Harbor has a campsite that is used on occasion and it offers an excellent view across Frederick Sound. Chapin Bay and Eliza Harbor provide good anchorages.</p> <p>Commercial Use Brown bear hunting, beachcombing, sightseeing, and wildlife viewing</p> <p>Non-commercial Use Residents from Kake and Petersburg use the area for deer hunting, berry picking, sightseeing, beachcombing, and wildlife viewing.</p> <p>Use Patterns Most of the use is boat based.</p>			

Use Area 04-06B

Eliza Harbor – Admiralty National Monument

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users as a result of this project.

Wildlife

NMFS identified two Steller sea lion haul outs in this use area. In this use area, 56 bald eagle nests have been mapped.

Fisheries

In this use area, 36 Class I streams have been mapped, of which, 11 were identified with high fishing value. These streams support populations of pink, chum, and coho salmon, steelhead trout, and Dolly Varden char. Guided use levels are low because of the remote nature of the area from any population center and the southeast exposure of the coastline to prevailing winds and storms.

Botany

Poa laxiflora was identified from one survey that covered 0.25 miles of shoreline.

Cultural/Heritage

Eight prehistoric sites were identified from 17 surveys that covered 5.75 miles.

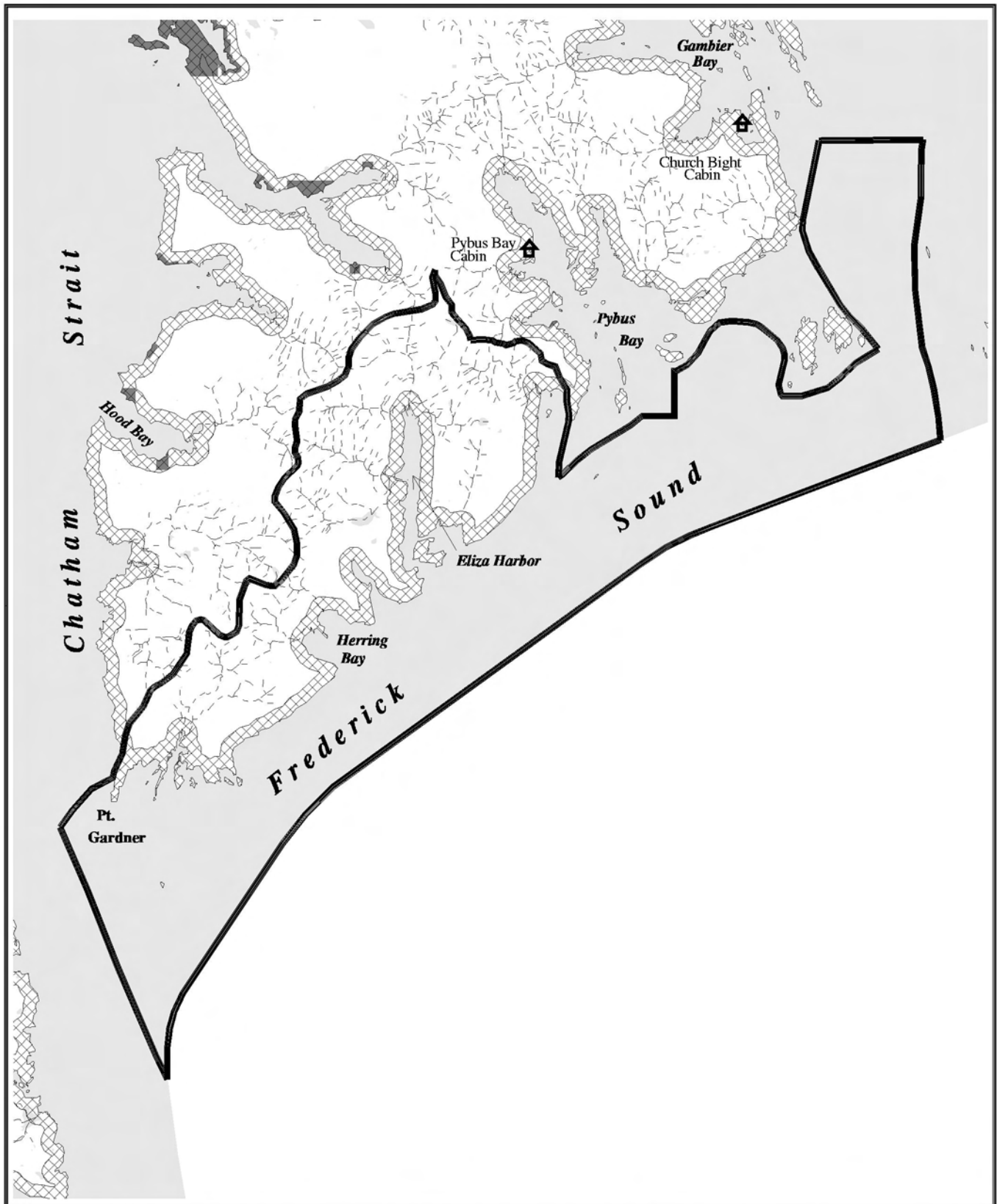
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		13	127	14	63	159	71	19	30	15	13	127	35
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Eliza Harbor
Use Area - 04-06B



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 04-07

Gambier Bay – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area is on Admiralty National Monument and part of the Kootznoowoo Wilderness. Located in the south central portion of the island, it extends from just south of Tiedeman Island farther south to Gambier Bay. The two primary bays in this Use Area are Mole Harbor and Gambier Bay.</p> <p>LUDs Special Interest, Wilderness Monument, Wilderness Monument Research Natural Area, and Wilderness Monument Wild River</p> <p>ROS Primitive and Semi-Primitive Motorized</p> <p>National Forest Shoreline Miles 133 miles</p> <p>National Forest Shoreline Acres 24,858 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Church Bight</p> <p>Shelters Mole Harbor</p> <p>Trails A three-mile trail goes from the shelter at Mole Harbor to Lake Alexander.</p> <p>Special Uses One cabin in Gambier Bay and one tent platform in Seymour Canal</p> <p><u>Non-National Forest System Lands</u></p> <p>A small private parcel of land with a cabin is located in Mole Harbor and additional private land is located on the north side of Gambier Bay.</p>			
<u>Recreation Use</u> <p>Area Attractions Gambier Bay is the largest bay in this area and provides excellent anchorages and protection from rough weather. Pleasant Bay is a very small bay that is also very protected and provides probably the best anchorage between Gambier Bay and Windfall Harbor. The trail at Mole Harbor is the only Forest Service trail on the entire southeast side of the island.</p> <p>Commercial Use Bear hunting, sightseeing, wildlife viewing, fishing, and kayaking</p> <p>Non-commercial Use Residents of Petersburg use this area for bear and deer hunting, berry picking, and fishing.</p> <p>Use Patterns The use that occurs takes place primarily near the developed facilities, private land, and the special use permit cabin and tent platform.</p>			

Use Area 04-07

Gambier Bay – Admiralty National Monument

Management/Resource Considerations

<i>Subsistence</i>	No restriction to any subsistence resource use is expected to result from this project.
<i>Wildlife</i>	In this use area, 90 bald eagle nests are mapped.
<i>Fisheries</i>	In this use area, 45 Class I streams have been mapped. Within Mole Harbor, Pleasant Bay, and Gambier Bay, six streams were identified with high fishing value. The majority of use occurred in Mole River. Pleasant Bay Creek has been used by ADF&G as a steelhead index stream.
<i>Botany</i>	Seven surveys covering 1.25 miles did not identify any rare or sensitive plants.
<i>Cultural/Heritage</i>	Thirty-eight surveys covering 16 miles revealed 18 sites within this use area; nine historic and nine prehistoric.

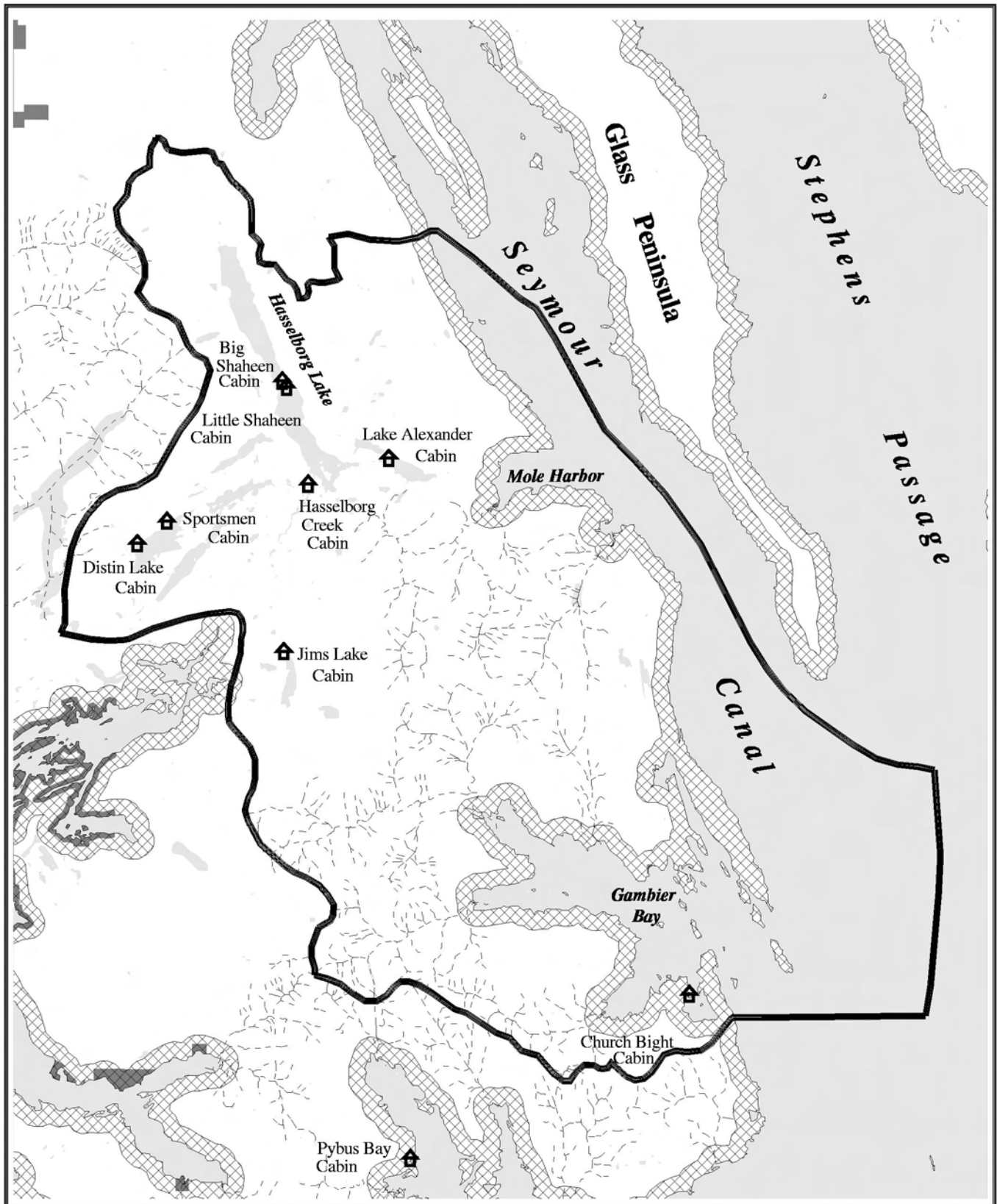
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	254	28	126	318	141	38	76	15	25	127	71
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Gambier Bay
Use Area - 04-07



- Use Area Boundary
- High Value Freshwater Fishing Streams
- Shoreline Use Zone

- Non National Forest Land
- Salt and Fresh Water
- Forest Service Recreation Cabin

1 0.5 0 1 2 Miles

Scale in Miles



Use Area 04-08

Northeast Admiralty – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
28	1,176	2,968	1,316
<u>Description</u> <p>This Use Area extends from Midway Point on Admiralty Island's eastern Glass Peninsula north to Point Retreat on the Mansfield Peninsula. Due to its proximity to Juneau, the Use Area receives considerable use. The primary bays in this Use Area are Barlow Cove, Young Bay, Oliver Inlet, and Doty Cove.</p> <p>LUDs Experimental Forest, Wilderness Monument, and Semi-Remote Recreation</p> <p>ROS Primitive, Roaded Natural, and Semi-Primitive Motorized</p> <p>National Forest Shoreline Miles 135 miles</p> <p>National Forest Shoreline Acres 34,497 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Admiralty Cove</p> <p>Special Use Permit Cabins Sixteen special use permit cabins are located within this use area.</p> <p>Trails Admiralty Cove to Young Lake</p>			
<u>Non-National Forest System Lands</u> <p>Private land is located on a portion of the unnamed island in Admiralty Cove and just south of Bear Creek. All of Horse and Colt Islands are in private ownership. There is a dock and parking area in Young Bay used by the Greens Creek Mine. The dock is permitted via a State tidelands permit and the parking lot is on private land. Oliver Inlet State Marine Park includes a small boat tram and a public recreation cabin.</p>			
<u>Recreation Use</u> <p>Area Attractions Barlow Cove and Oliver Inlet are the best anchorages. Admiralty Cove has a large tidal meadow and stream providing wildlife viewing and fishing.</p> <p>Commercial Use There is very little commercial use of this area, possibly because there are not many places with good anchorages for larger boats. Commercial use is not allowed within one mile of Admiralty Cove because of its proximity to the public recreation cabin there.</p> <p>Non-commercial Use Hunting, berry picking, beachcombing, firewood cutting, fishing, and wildlife viewing</p>			

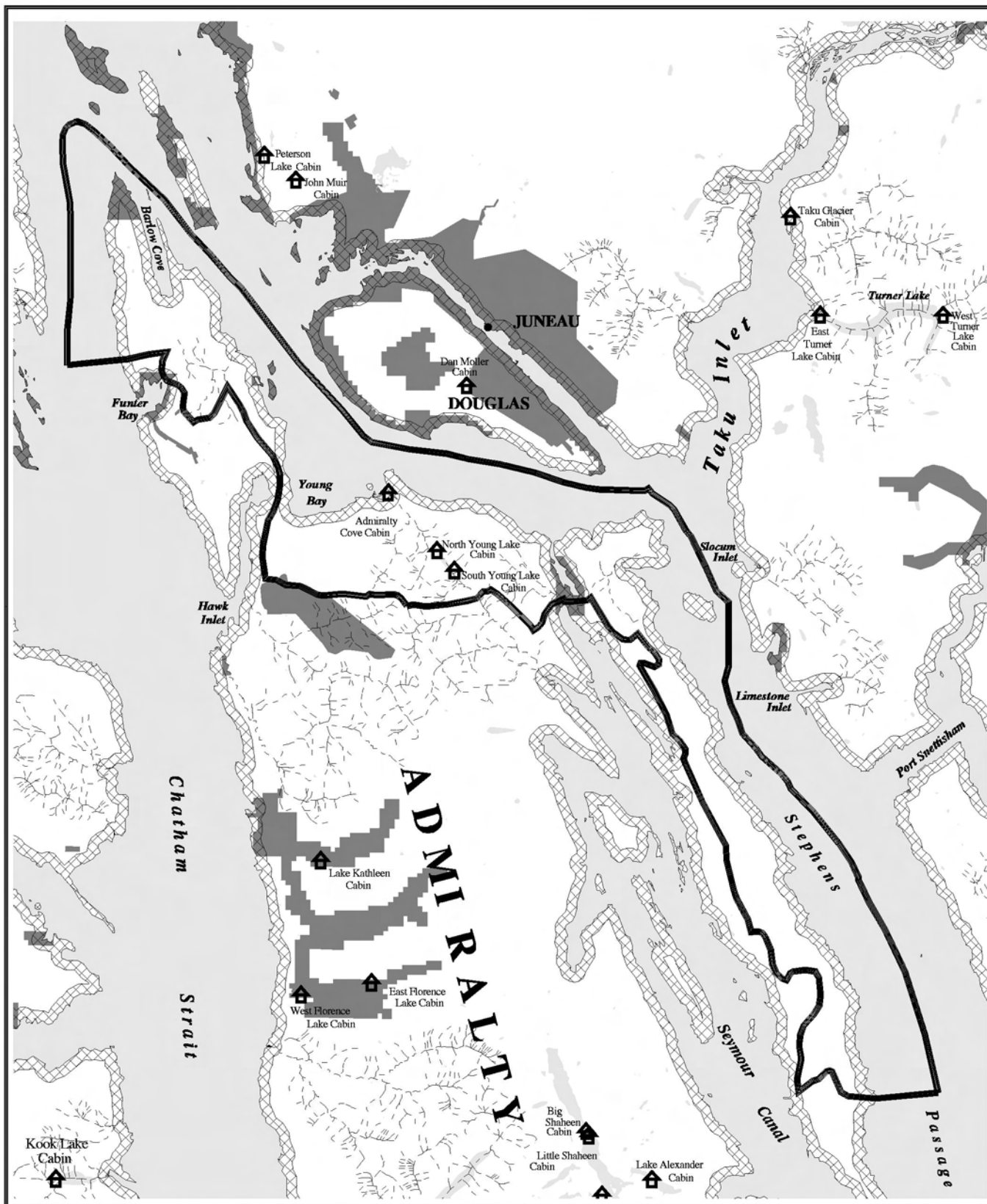
Use Area 04-08

Northeast Admiralty – Admiralty National Monument

Use Patterns	This area receives much of its use from Juneau and Petersburg. Boaters and kayakers use it for day trips and overnight excursions. The high number of special use permit cabins (16) in this Use Area provides a focal point for the recreation use. There are numerous places to go ashore and areas away from the developed sites also receive use. In addition, there are many private cabins on Horse and Colt Islands and people staying in these cabins recreate in this area as well.												
<u>Management/Resource Considerations</u>													
Subsistence	Subsistence catches of salmon have been reported at Admiralty and Bear Creeks. There are no anticipated restrictions on subsistence resource users as a result of this project.												
Wildlife	In this use area, 187 bald eagle nests have been mapped.												
Fisheries	In this use area, 38 Class I streams have been mapped, three of which are identified with high fishing values. Admiralty Creek, in Young Bay, is an important Juneau sport fishery for spring steelhead, Dolly Varden char, and fall coho. The site is also popular because of the presence of a public use cabin. For these reasons, requests for guided sport fishing at Admiralty Creek historically have been denied.												
Botany	There are no known sensitive plants. This area has not received intensive surveys.												
Cultural/Heritage	In this use area, 13 surveys covering 10.5 miles have identified five sites, two historic and three prehistoric.												
<u>Alternative Comparisons</u>													
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		118	594	132	588	1,484	658	59	148	66	118	296	329
Enclaves	N/A	None			Cordwood Creek			None			Cordwood Creek		
					Fowler Creek						Fowler Creek		
15% Areas	N/A	None			None			None			None		
<u>Mitigation</u>													
See Appendix C for mitigation measures.													
Outfitter/guide use is prohibited within one mile of Admiralty Cove cabin.													

Northeast Admiralty

Use Area - 04-08



Use Area Boundary



High Value Freshwater Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin



USE AREA
LOCATOR

10.50 1 2 Miles



Scale in Miles

Use Area 04-09

Seymour Canal – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
10	420	1,060	470
<u>Description</u> <p>This use area encompasses much of the eastern shoreline along Seymour Canal. The area is a relatively short flight from Juneau and receives local use. There are several bays but they do not have many good anchorages because of the large tidal flats and exposure.</p> <p>LUDs Wilderness Monument and Wild River</p> <p>ROS Primitive, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 174 miles</p> <p>National Forest Shoreline Acres 33,597 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>Special Use Permit Cabins There are 13 Forest Service special use permit cabins and one tent platform in this use area.</p> <p>Shelter Forest Service shelter at Windfall Harbor</p> <p>Trail/Bear Viewing One-mile trail leading to a bear viewing tower at Pack Creek</p>			
<u>Non-National Forest System Lands</u> <p>Oliver Inlet State Marine Park includes a small boat tram and a public recreation cabin.</p>			
<u>Recreation Use</u> <p>Area Attractions The northern portion of the area has relatively protected water, with many small islands and coves and scenery.</p> <p>Commercial Use Bear hunting</p> <p>Non-commercial Use Kayaking, hunting, berry picking, sightseeing, wildlife viewing, and firewood cutting</p> <p>Use Patterns The area is a relatively short flight from Juneau. It receives local use from the residents of Petersburg and Juneau. Kayakers heading from Oliver Inlet to Pack Creek often stop and camp in the northern end of the Use Area. Special Use permit cabins and tent platforms are a focal point for use, particularly during the fall deer-hunting season. In the fall, hunting parties will set up multi-day camps with tents and tarps.</p> <p>Areas of Concern The King Salmon River is a recommended Wild River.</p>			

Use Area 04-09

Seymour Canal – Admiralty National Monument

Management/Resource Considerations

<i>Subsistence</i>	There are no anticipated restrictions on subsistence resource users.
<i>Wildlife</i>	In this use area, 245 bald eagle nests have been mapped.
<i>Fisheries</i>	In this use area, 46 Class I streams have been mapped, two of which were identified as having high fishing values. Although the King Salmon River is a relatively productive system supporting large populations of pink and coho salmon, and Dolly Varden char, it is difficult to access because of an extensive tide flat.
<i>Botany</i>	No rare or sensitive plants were found during six surveys that covered 0.75 mile.
<i>Cultural/Heritage</i>	Six prehistoric sites have been identified from 16 surveys that covered 10.5 miles.

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
		Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
<i>Commercial Allocation (groups by season)</i>	N/A	42	318	47	210	530	235	31	53	24	42	212	118
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

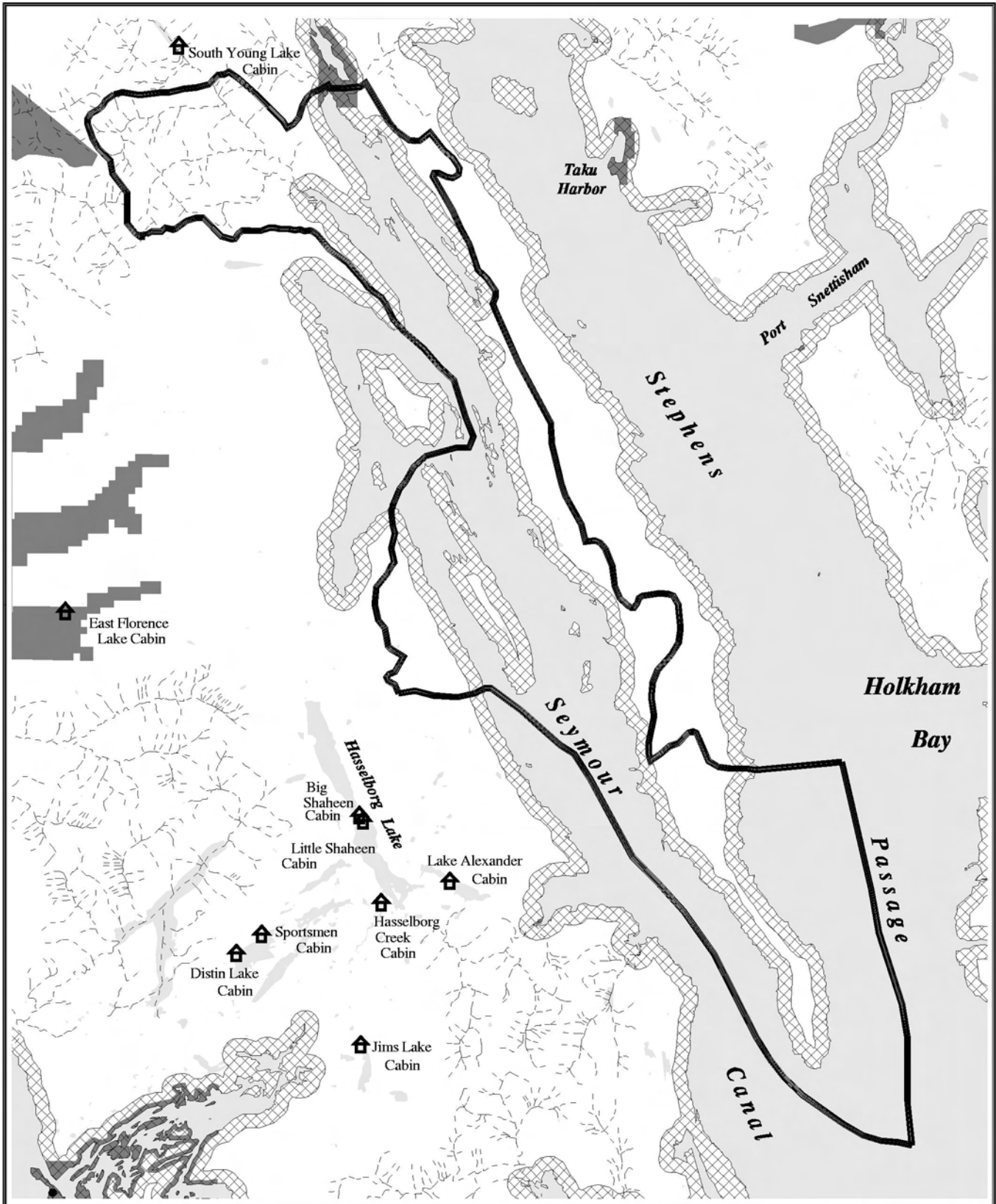
See Appendix C for mitigation measures.

Guided fishing is not permitted in all creeks flowing into Windfall Harbor, Pack Creek, and Swan Cove. Bear viewing is the recreation emphasis in these areas.

No guided fishing is allowed upstream of the grass flats on King Salmon River in July to protect king salmon spawning habitat.

Seymour Canal

Use Area - 04-09



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin

10.50 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 04-10A

Greens Creek – Admiralty National Monument

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
4	168	424	188
<u>Description</u> This use area includes the shoreline from Greens Creek to Wheeler Creek along Chatham Strait. LUDs Wilderness Monument and Non-Wilderness Monument ROS Primitive, Semi-Primitive Non-Motorized, Semi-Primitive Motorized National Forest Shoreline Miles 9 miles National Forest Shoreline Acres 2,000 acres Communities None			
<u>Forest Service Facilities</u> Special Uses Cabins There is a Special Uses cabin at Wheeler Creek. Communication Site Point Marsden			
<u>Non-National Forest System Lands</u> There are several private parcels in Wheeler Creek.			
<u>Recreation Use</u> Area Attractions Greens and Wheeler Creeks are large creeks that are readily accessible from Juneau. Commercial Use Fishing Non-commercial Use Brown bear and deer hunting, berry picking, firewood cutting, and wildlife viewing Use Patterns The commercial component of the use is fly-in fishing of several hours duration. On some days, two groups will use the site, one in the morning and one in the afternoon. Often, this use is connected to cruise ship activity in Juneau. Private landowners at Wheeler Creek spend several days to several weeks at their cabins and participate in a variety of activities. Wheeled planes have been observed on the beach at Wheeler Creek.			

Use Area 04-10A

Greens Creek – Admiralty National Monument

Management/Resource Considerations

Subsistence

There are no anticipated restrictions to subsistence resource users.

Wildlife

In this use area, 11 bald eagle nests have been mapped.

Fisheries

In this use area, two Class I streams have been mapped and identified as high value fishing streams. Both streams are popular guided sport fishing destinations because of their high fisheries value and close proximity to Juneau. Most fish caught in both streams are Dolly Varden char and pink salmon; it has been customary for clients to practice catch and release. The Forest Plan lists Wheeler Creek king salmon as sensitive because of its island location and small population size; the Forest Plan calls for the protection and maintenance of the king salmon population. There have been no reported king salmon caught through guided sport fishing.

Botany

There are no known sensitive plants. This area has not received intensive surveys.

Cultural/Heritage

Two historic and two prehistoric sites were identified from two surveys that covered 3.25 miles.

Alternative Comparisons

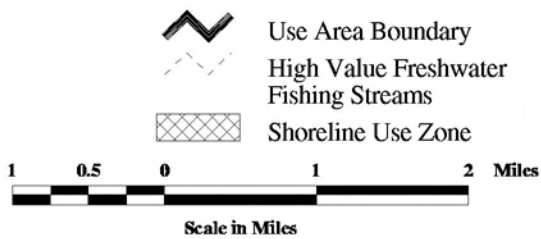
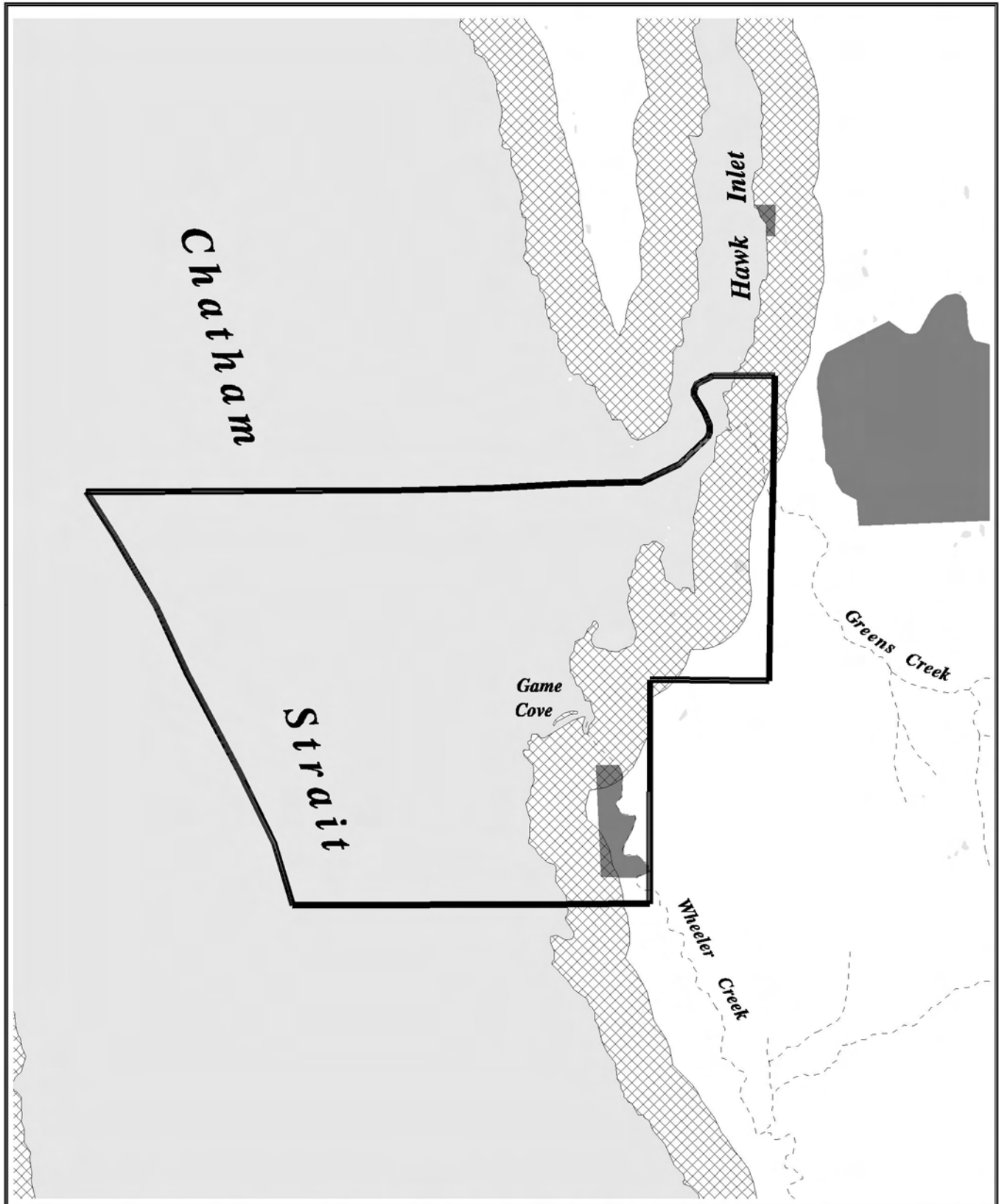
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		17	170	19	84	212	94	15	140	15	17	127	47
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Guided fishing is not allowed in the lower reaches of Wheeler Creek in July to avoid affecting spawning king salmon.

Greens Creek
Use Area - 04-10A



- Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



Use Area 04-10B

Northwest Admiralty – Admiralty National Monument

Recreation Carrying Capacity (total capacity for all users)			
Groups at one time	Spring	Summer	Fall
7	294	742	329
Description This use area is on the northwest coast of Admiralty Island and extends from Funter Bay south to Mitchell Bay.			
LUDs	Semi-Remote Recreation, Wilderness National Monument, and Non-Wilderness National Monument		
ROS	Primitive, Roaded Natural, Semi-Primitive Motorized and Semi-Primitive Non-Motorized		
National Forest Shoreline Miles	73 miles		
National Forest Shoreline Acres	21,055 acres		
Communities	Cube Cove		
Forest Service Facilities			
Special Uses Cabins	Hawk Inlet		
Non-National Forest System Lands There is private land in Funter Bay, Hawk Inlet, and Cube Cove. Funter Bay has a State Marine Park on the south shore.			
Recreation Use			
Area Attractions	Scenic views		
Commercial Use	Brown bear hunting, sightseeing, wildlife viewing, and fishing		
Non-commercial Use	Brown bear and deer hunting, berry picking, firewood cutting, beachcombing, wildlife viewing, and fishing		
Use Patterns	Much of the shoreline provides poor anchorages except in the major bays. Juneau primarily uses the northern portion of this use area while the community at Cube Cove primarily uses the area from Hawk Inlet south to Fishery Creek. The community of Angoon uses this area extensively. The Greens Creek Mine is located in Hawk Inlet and the mine's plan of operations does not allow workers to access the shoreline for recreation purposes.		

Use Area 04-10B

Northwest Admiralty – Admiralty National Monument

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, there are 137 mapped bald eagle nests.

Fisheries

In this use area, 16 Class I streams have been mapped. There are few sheltered streams accessible by plane or boat. Fishery and Thayer Creeks both support pink and chum salmon populations and were identified with high fishing values. Although both systems have large watersheds, these streams offer marginal fishing opportunities because of anadromous fish barriers a short distance from saltwater. These barriers greatly limit the potential fishing opportunity by reducing available salmon spawning and rearing habitat.

Botany

Poa macrocalyx was found along a rocky bluff during one survey that covered 0.25 mile of shoreline.

Cultural/Heritage

Two historic sites and one prehistoric site were identified within this use area from four surveys that covered 2.5 miles.

Alternative Comparisons

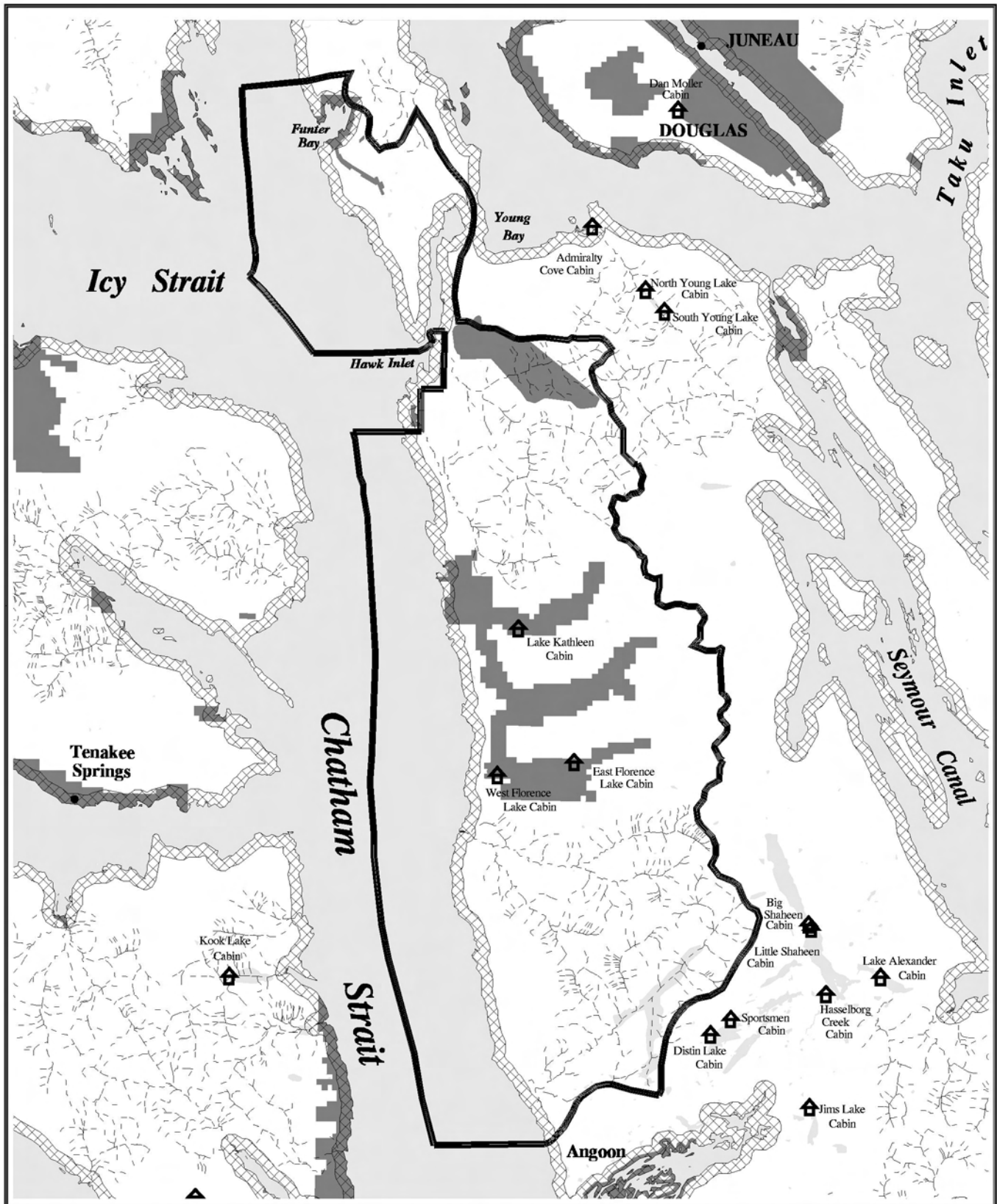
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		29	297	33	147	371	165	44	37	29	29	149	82
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Northwest Admiralty

Use Area - 04-10B



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



USE AREA
LOCATOR

10.50 1 2 Miles
Scale in Miles

Use Area 04-11

Hoonah Area (Northwest Chichagof) – Hoonah Ranger District

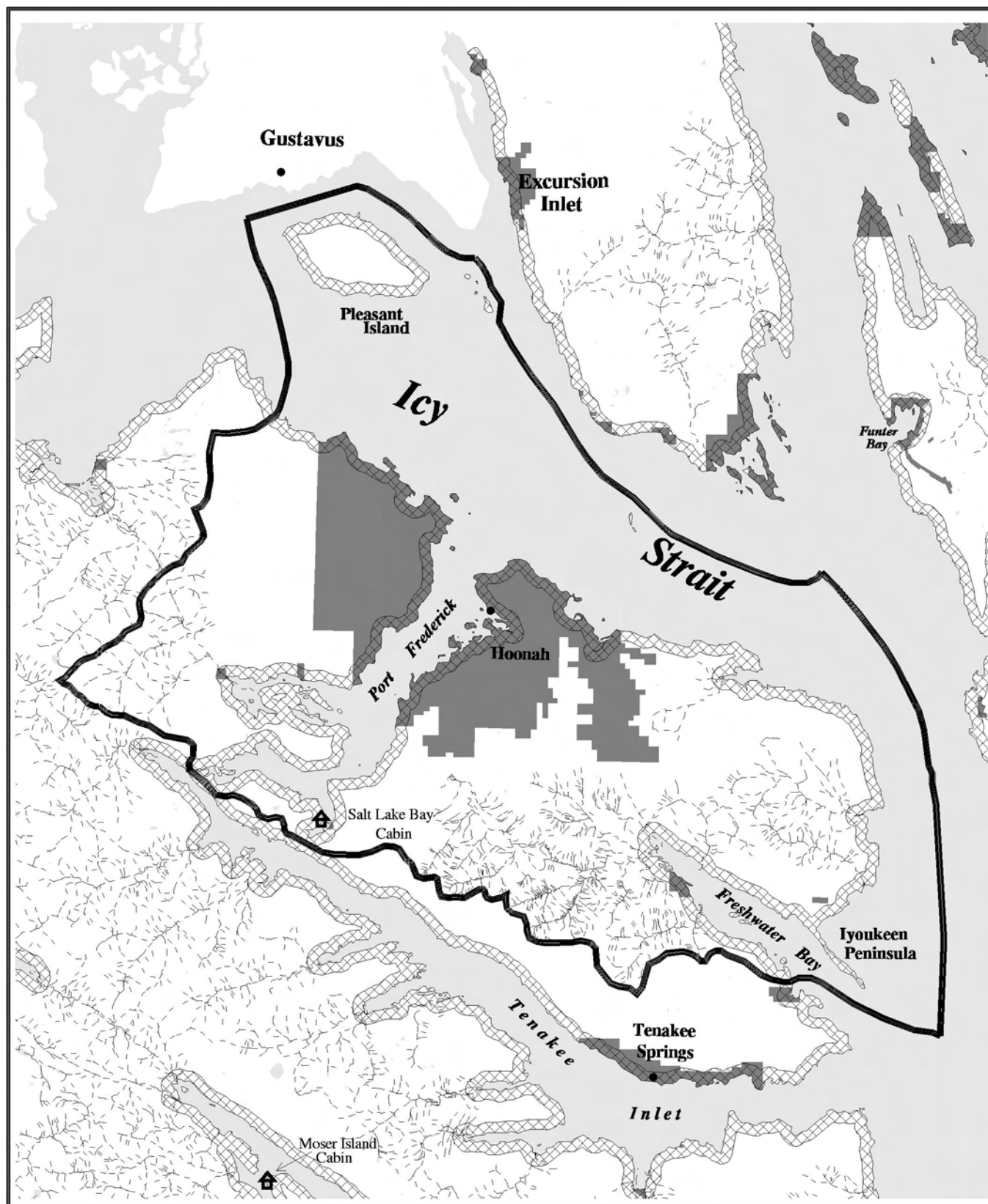
<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
14	588	1,484	658
<u>Description</u> <p>This Use Area encompasses the north and northeast portion of Chichagof Island from Chicken Creek east to Freshwater Bay. Icy Strait and Chatham Strait are the surrounding waterways to the north and northeast. Principal bays within Port Frederick include: Neka Bay, Eight Fathom Bight, and Salt Lake Bay. This area also includes Pleasant Island Wilderness, which receives the majority of commercial and non-commercial use from the community of Gustavus.</p> <p>LUDs Old Growth, Semi-Remote Recreation, Scenic Viewshed, Timber Production, and Wilderness</p> <p>ROS Primitive, Roaded Modified, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 185 miles</p> <p>National Forest Shoreline Acres 40,377 acres</p> <p>Communities Hoonah has a population of approximately 900 people and is centrally located in the use area. Hoonah is serviced by a boat harbor, airport, and the Alaska Marine Highway system. Tourist and recreationists visit Hoonah for access to Port Frederick, Icy Strait and the forest road system.</p> <p>Alaska Coastal Management Act Hoonah Coastal Management Plan</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Salt Lake Bay</p> <p>Trails Wukuklook and Suntaheen</p>			
<u>Non-National Forest System Lands</u> <p>This use area includes a large area of Native Corporation lands in Port Frederick surrounding the community of Hoonah. The community of Whitestone Logging Company lies within Native Corporation lands adjacent to Hoonah. Private property is also situated along the mouth of Game Creek.</p>			
<u>Recreation Use</u> <p>Area Attractions Anadromous fish streams, wildlife viewing, scenic remote areas, and access to shoreline areas by road and boat</p> <p>Commercial Use Brown bear hunting, freshwater fishing, camping, and sightseeing</p> <p>Non-commercial Use Residents and visitors to the community of Hoonah are the primary users of this area. Port Frederick is an important recreation and subsistence area for residents of Hoonah.</p> <p>Use Patterns Commercial fishing; recreational boating and kayaking; boat-based outfitter/guides; boat-based subsistence use; and boat-based sport fishing are popular. The Hoonah forest road system (170 miles of drivable road) receives steady traffic from residents and visitors accessing the shoreline areas of northeastern Chichagof Island.</p>			

Use Area 04-11

Hoonah Area (Northwest Chichagof) – Hoonah Ranger District

Primary Use Areas	Chicken Creek, Pleasant Island, and Freshwater Bay are primary commercial use areas. Other popular areas include Port Frederick, Neka Bay, Salk Lake Bay, Eight Fathom Bight, False Bay, and Whitestone Harbor.												
Areas of Concern	Float homes occupying the primary anchorages in Freshwater Bay may restrict access to the national forest wheeled plane landing areas at Neka Bay.												
<u>Management/Resource Considerations</u>													
Subsistence	An average of two subsistence-fishing permits have been returned for use at Neka River and Seagull Creek. There are no anticipated restrictions on subsistence resource users due to this project.												
Wildlife	One NMFS identified Steller sea lion haul out is located in this use area. In this use area, 420 bald eagle nests are mapped. All of this use area is within the Northeast Chichagof Controlled Use Area for state and federal management of brown bears.												
Fisheries	The broad valleys found in the area provide for streams with abundant fish habitat and fishing opportunities. Seventy Class I streams have been mapped in the area, eight of which were identified with high fishing potential. Several streams are important fisheries for the people of Hoonah and some can be accessed through the road system.												
Botany	No rare or sensitive plants were identified in four surveys that covered 0.5 mile.												
Cultural/Heritage	In this use area, 21 historic and 15 prehistoric sites were identified in 41 surveys that covered 63.5 miles.												
<u>Alternative Comparisons</u>													
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		59	223	66	294	742	329	70	158	33	59	371	165
Enclaves	N/A	None			8-Fathom Dock Area			None			8-Fathom Dock Area		
					Salt Lake Bay Dock						Salt Lake Bay Dock		
					Red Cliff						Red Cliff		
					Kennel Creek						Kennel Creek		
15% Areas	N/A	None			Neka Bay-N. Bight			None			Neka Bay-N. Bight		
					Neka Bay-S. Bight						Neka Bay-S. Bight		
					Iyoukeen Peninsula						Iyoukeen Peninsula		
<u>Mitigation</u>													
See Appendix C for mitigation measures.													
Eight Fathom Bight and Salt Bay docks are for Forest Service administrative use. Outfitter/guides may use these docks as permitted but they may not leave boats unattended or obstruct administrative use.													
Wheeled plane landings will be permitted at Neka Bay at the frequencies specified in the selected alternative.													

Hoonah Area Use Area - 04-11



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



USE AREA
LOCATOR

10.50 1 2 Miles
Scale in Miles

Use Area 04-12

Tenakee Inlet (Southeast Chichagof) – Sitka/Hoonah Ranger Districts

Recreation Carrying Capacity (total capacity for all users)			
Groups at one time	Spring	Summer	Fall
15	630	1,590	705
Description Encompassing central and eastern portions of Chichagof Island most of this use area is administered by the Sitka Ranger District with a small portion near Freshwater Bay administered by the Hoonah Ranger District. All of the uplands surrounding Tenakee Inlet from north of Pavlov Harbor to Pt Hayes are included. This use area also includes the following Special Designation areas in their entirety: Kadashan LUD II, Trap Bay LUD II, and Kadashan LUD II Wild River. Access to the shoreline areas of Chatham Strait is difficult and is dictated by weather conditions, however there are many miles of accessible shoreline in the following areas: Pavlof Harbor, Wachusetts Cove, and Basket, Long, Seal, Saltery, Crab, Kadashan, Corner, and Trap Bays.			
LUDs	Remote Recreation, Semi-Remote Recreation, Old-growth Habitat, LUD II, LUD II Scenic River, Scenic Viewshed, Modified Landscape, and Timber Production		
ROS	Primitive, Semi-Primitive Motorized, Semi-Primitive Non-Motorized, and Roded Modified		
National Forest Shoreline Miles	178 miles		
National Forest Shoreline Acres	45,117 acres		
Communities	The community of Tenakee Springs is located within this use area.		
Alaska Coastal Management Act	The area south of Tenakee Inlet is within the boundary of the Sitka District Coastal Management Program.		
Forest Service Facilities			
Public Recreation Cabins	Kook Lake, however this cabin is located more than a mile inland from the saltwater shoreline.		
Administrative Cabins	Trap Bay, Corner Bay boat dock and work center, Kadashan		
Shelters	Long Bay and Saltery Bay		
Trails	Little Basket Bay to Basket Lake		
Non-National Forest System Lands The Tenakee Trail is within the use area, however, only the eastern end is located on national forest lands with most of the trail located within the corporate limits of the City of Tenakee Springs. Two state of Alaska cabins are located in the Kadashan drainage, and a private cabin is located near the mouth of Crab Bay. Native Allotment parcels are located at Kadashan and The Portage. A large tract of Native Corporation land is located along much of the use area’s Chatham Strait shoreline with a small parcel of Native Corporation land at the head of Basket Bay. State select land is located at Pavlof Harbor.			

Use Area 04-12

Tenakee Inlet (Southeast Chichagof) – Sitka/Hoonah Ranger Districts

<u>Recreation Use</u>	
<i>Area Attractions</i>	Tenakee Hot Springs, Forest Service cabin and shelter, The Portage, Basket Bay, and Kadashan River
<i>Commercial Use</i>	Brown bear hunting, freshwater fishing, hiking, sightseeing
<i>Non-commercial Use</i>	Uplands surrounding Tenakee Inlet are important for their non-guided, recreational value to visitors and residents of Tenakee Springs, while the Chatham Strait shoreline has unguided recreational value to both the residents of Tenakee Springs and Angoon.
<i>Use Patterns</i>	Commercial trollers and crabbers, boat and land based outfitter/guides, and recreational boaters
<i>Primary Use Areas</i>	City of Tenakee Springs, Kadashan River, Basket Bay, Goose Flats, The Portage
<i>Areas of Concern</i>	Kadashan River is a recommended Scenic River. Also, potential for trespass on private land.
<u>Management/Resource Considerations</u>	
<i>Subsistence</i>	An annual average of 23 subsistence fishing permits have been returned for use at Kook Lake, Pavlof River, and Sitkoh Bay. There are no anticipated restrictions on subsistence resource users as a result of this project.
<i>Wildlife</i>	One NMFS-identified Steller sea lion haul-out is located in this use area. There are 354 mapped bald eagle nests in this use area. The north shore of the use area from The Portage to East Point lies within the Northeast Chichagof Controlled Use Area for state and federal management of brown bears.
<i>Fisheries</i>	In this use area, 97 Class I streams have been mapped and 16 high value fishing streams identified. Kook Lake supports a diminished return of sockeye salmon, and Pavlof Lake has a very small sockeye run. A cooperative sockeye stock assessment program, approved by the Federal Subsistence Board, was recently started at Kook Lake. All systems contain Dolly Varden char and coho, chum and pink salmon. The Kadashan River is the largest producer of coho salmon in this area.
<i>Botany</i>	No rare or sensitive plants were found during two botanical surveys conducted on 0.25 miles of shoreline.
<i>Cultural/Heritage</i>	A total of 49 surveys covering 128.75 miles have been completed in this use area, with 21 historic and 34 prehistoric sites identified.

Use Area 04-12

Tenakee Inlet (Southeast Chichagof) – Sitka/Hoonah Ranger Districts

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		63	557	71	315	795	353	37	80	35	63	557	176
Enclaves	N/A	None			Corner Bay Road			Corner Bay Road			Corner Bay Road		
					Crab Bay								
15% Areas	N/A	None			Seal Bay			None			Seal Bay		

Mitigation

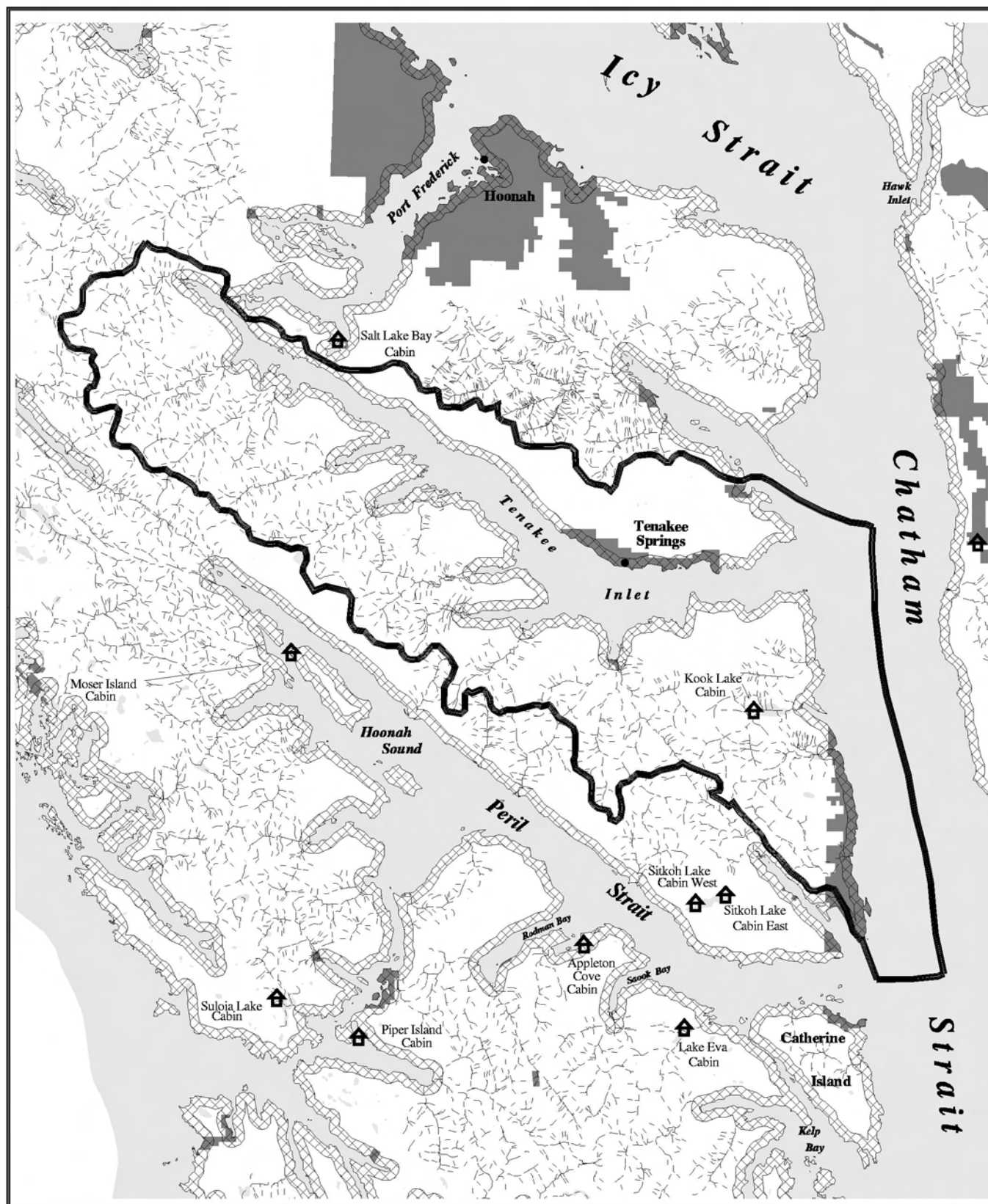
See Appendix C for mitigation measures.

Corner Bay dock is for Forest Service administrative use. Outfitter/guides may use these docks as permitted but they may not leave boats unattended or obstruct administrative use.

Use will not be authorized for access to kook Lake from Basket Bay unless outfitter/guides provide proof of permission to cross private lands.

Access to Basket Lake from Little Basket Bay will be limited to the trail corridor easement across private land.

Tenakee Inlet Use Area - 04-12



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



USE AREA
LOCATOR

10.5 1 2 Miles
Scale in Miles

Use Area 04-13

Peril Strait (Southern Chichagof, NW Baranof) – Sitka Ranger District

Recreation Carrying Capacity (total capacity for all users)			
Groups at one time	Spring	Summer	Fall
16	672	1,696	752
Description Most of this use area encompasses the southern end of Chichagof Island from near Sergius Point to Pt. Hayes and includes a small portion of extreme northwest Baranof Island from south of Bear Bay to a point on the Duffield Peninsula west of Point Peschani. Access to the shoreline along Peril Strait & Hoonah Sound is dictated by weather conditions and tidal flow. Easily accessed shoreline is found in Deep Bay, Bear and Baby Bear coves, Goose Cove, Poison Cove, Ushk Bay, Fick Cove, Patterson Bay, False Island Bight, Lindenberg Harbor, Florence Bay, and Sitkoh Bay.			
LUDs	LUD II, Modified Landscape, Old Growth, Semi-Remote Recreation, Scenic Viewshed, Timber Production, and Wilderness		
ROS	Primitive, Roaded Modified, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized		
National Forest Shoreline Miles	200 miles		
National Forest Shoreline Acres	50,323 acres		
Communities	None		
Alaska Coastal Management Act	Sitka District Coastal Management Program		
Forest Service Facilities			
Public Recreation Cabins	Moser Island, East Sitkoh and West Sitkoh; however, the East and West Sitkoh cabins are each located more than a mile inland from saltwater.		
Administrative Cabins	Forest Service work center and dock at False Island		
Shelters	Ostoia Island		
Trails	Sitkoh Lake Trail		
Non-National Forest System Lands Native Allotment parcels are located at Deep Bay and Poison Cove, and Native Corporation parcels are located at Broad Finger and Sitkoh Creek. The former Chatham Cannery site is privately owned and located at Sitkoh Bay. A state marine park is located at Bear and Baby Bear coves.			
Recreation Use			
Area Attractions	Hunting, freshwater fishing, crabbing and shrimping, wildlife viewing, spawning salmon, public recreation cabins and shelters, old growth forests, historic logging area, accessible beaches, Nelson Falls, and contrasting habitats		
Commercial Use	Brown bear hunting, deer hunting, freshwater fishing, hiking, and sightseeing		

Use Area 04-13

Peril Strait (Southern Chichagof, NW Baranof) – Sitka Ranger District

Non-commercial Use	Use in this area is primarily by residents of Sitka and transient boaters along the travel route to Sitka. Uplands surrounding the Hoonah Sound area are important for their recreational value to the residents of Sitka. The water route from Sitka through inner waterways is protected and can be traveled in most weather conditions.
Use Patterns	Commercial crabbers, boat and land based outfitter/guides, and recreational boaters
Primary Use Areas	The entire area is used.
Areas of Concern	Trespass on private land, and the trail to Nelson Falls is in poor condition.
<u>Management/Resource Considerations</u>	
Subsistence	Sitkoh Lake supports an important subsistence fishery. There are no anticipated restrictions on subsistence resource use as a result of this project.
Wildlife	In this use area, there are 263 mapped bald eagle nests and one NMFS-identified Steller sea lion haul-out.
Fisheries	In this use area, 108 Class I streams were mapped, with 21 of these having high value. Most of these streams contain runs of pink, chum, and coho salmon as well as Dolly Varden char, cutthroat trout, and steelhead. This area also contains two large lakes, Sitkoh and Suloia. Suloia Lake contains rainbow trout. Sitkoh Lake supports sockeye, pink, chum, and coho salmon; rainbow, steelhead, and cutthroat trout; and Dolly Varden char. Sitkoh Lake is an important subsistence and recreational fishery. The steelhead return at Sitkoh Lake has attracted a very popular sport fishery. In recent years sockeye sport fishing in Sitkoh Lake drainages and Sitkoh Bay has been closed by ADF&G because of low escapements.
Botany	One botanical survey has been completed covering about 0.25 miles of shoreline with no rare or sensitive plants identified.
Cultural/Heritage	Seven historic and 29 prehistoric sites have been identified from 80 surveys covering 72.5 miles.

Use Area 04-13

Peril Strait (Southern Chichagof, NW Baranof) – Sitka Ranger District

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		67	509	75	336	848	376	101	92	74	67	678	188
Enclaves	N/A	None			Sitkoh Bay Road			Sitkoh Bay Road			Sitkoh Bay Road		
15% Areas	N/A	None			Nelson Falls			Nelson Falls			Nelson Falls		
					Nismeni Point						Nismeni Point		

Mitigation

See Appendix C for mitigation measures.

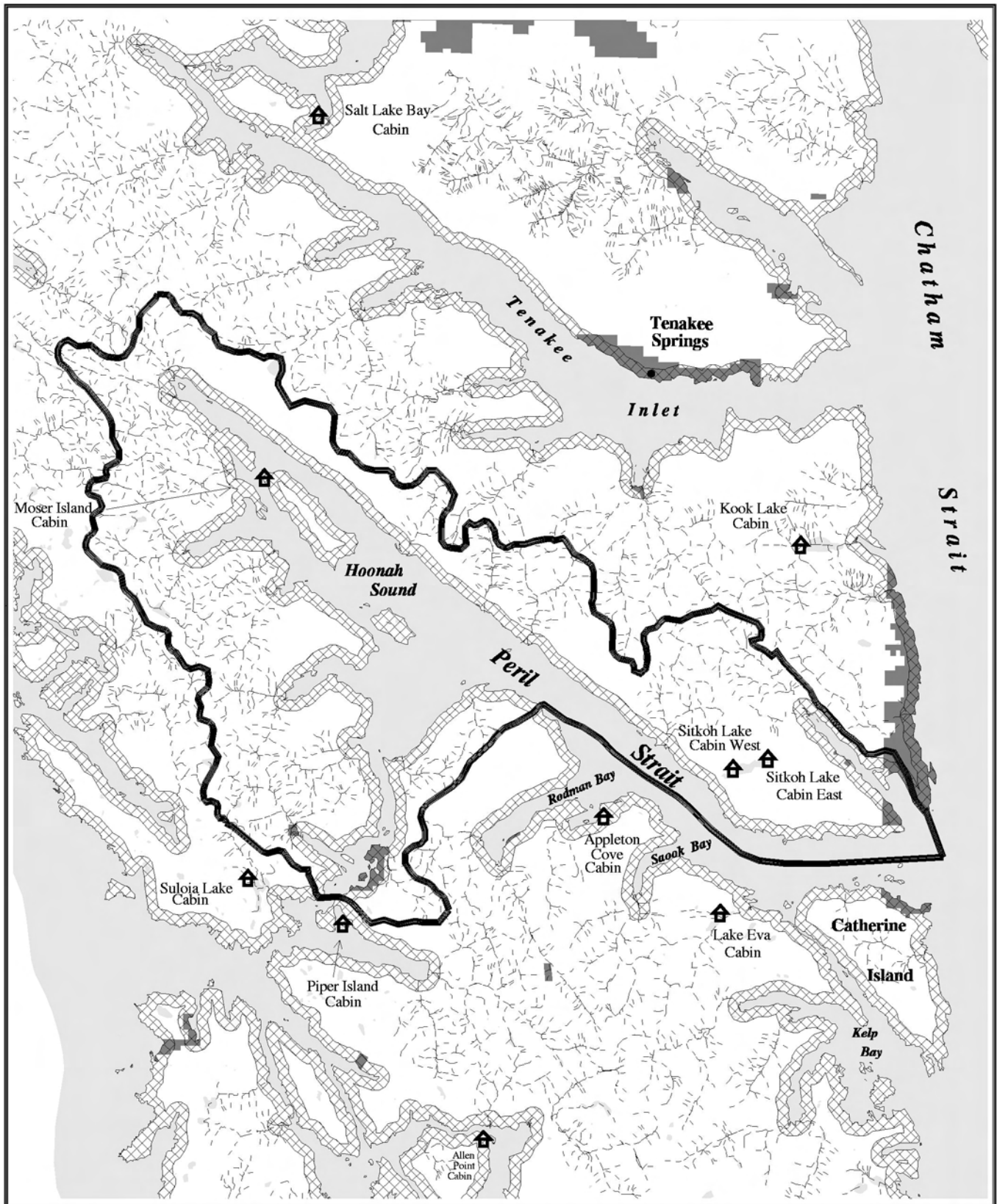
False Island dock is for Forest Service administrative use. Outfitter/guides may use these docks as permitted, but they may not leave boats unattended or obstruct administrative use.




Access along Sitkoh Lake trail will be limited to the trail corridor easement across private land.




Nelson Falls trail use will not be allowed for large groups until the trail is hardened.

Outfitter/guides will not be allowed to fly clients into Sitkoh Lake.

Peril Strait Use Area - 04-13



-  Use Area Boundary
-  High Value Freshwater Fishing Streams
-  Shoreline Use Zone

-  Non National Forest Land
-  Salt and Fresh Water
-  Forest Service Recreation Cabin



10.50 1 2 Miles
Scale in Miles

USE AREA
LOCATOR

Use Area 04-14

Slocum Arm (Southwest Chichagof) – Sitka Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
8	336	848	376
<u>Description</u> <p>Use area 04-14 is located in the southwestern region of Chichagof Island including offshore islands. This area encompasses most of the southern portion of the of the West Chichagof – Yakobi Wilderness, between the entrance to Klag Bay and Krugloi Island in Salisbury Sound. Access to uplands with exposed coastline is rarely possible because of ocean swell. Many miles of easily accessible shoreline can be found in the following areas: Leo’s Anchorage, Slocum Arm, Hidden Cove, Flat Cove, Waterfall Cove, Falcon Arm, Ford Arm, Klag Bay, Lake Anna, Sister Lake, and leeward offshore islands.</p> <p>LUDs Wilderness</p> <p>ROS Primitive, Semi-Primitive Motorized, Semi-Primitive Non-Motorized, and Rural</p> <p>National Forest Shoreline Miles 245</p> <p>National Forest Shoreline Acres 29,873 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Sitka District Coastal Management Program</p>			
<u>Forest Service Facilities</u> <p>Special Uses Cabins There are two private cabins under Special Use permit. The first cabin is at the entrance to Klag Bay and the second is where Lake Anna and Sister Lake meet.</p>			
<u>Non-National Forest System Lands</u> <p>Private land is located on Bauer Island and at several locations adjacent to Klag Bay. Small Native Corporation parcels are located at the entrance to Klag Bay and at the Potato Patch.</p>			
<u>Recreation Use</u> <p>Area Attractions Subsistence fishery, remote wilderness and scenic values, historical mining buildings and equipment</p> <p>Commercial Use Brown bear hunting, freshwater fishing, hiking, sightseeing</p> <p>Non-commercial Use Most of the non-commercial use in this area is primarily by residents of Sitka and others seeking an isolated wilderness experience.</p> <p>Use Patterns Commercial trollers, boat based commercial outfitter/guides, and recreational boaters</p> <p>Primary Use Areas Slocum Arm, Ford Arm, and Klag Bay</p>			

Use Area 04-14

Slocum Arm (Southwest Chichagof) – Sitka Ranger District

Management/Resource Considerations

Subsistence	Streams in this area support important subsistence sockeye fisheries for residents of Sitka. Subsistence permits have been returned for use at Lake Anna, Klag Bay, Ford Arm, and Fortuna Straights. There are no anticipated restrictions on subsistence resource users due to guided recreation use.
Wildlife	In this use area, there are 29 mapped bald eagle nests.
Fisheries	In this use area, 33 Class I streams have been mapped and four high value fishing streams identified. Most of these streams contain runs of coho, pink, and chum salmon, Dolly Varden char, and small runs of steelhead. There are five sockeye salmon systems in the area, three of which are heavily used subsistence areas due to their relatively close proximity to Sitka. Lake Leo and Sisters Lake systems contain smaller sockeye runs. Sockeye salmon harvests have increased substantially at Klag Bay. If harvest trends continue to increase, the stock may be at risk to decline. In response to increasing harvest trends, ADF&G has restricted subsistence and sport fisheries in Klag Bay.
Botany	In this use area, 12 botanical surveys have been done covering about 1.5 miles of the shoreline. <i>Botrychium virginianum</i> was found at one beach meadow at one site on Khaz Peninsula.
Cultural/Heritage	In this use area, 26 cultural resource surveys covering 3.5 miles have been conducted. Ten sites have been identified on National Forest System lands; four are considered historic and six prehistoric.

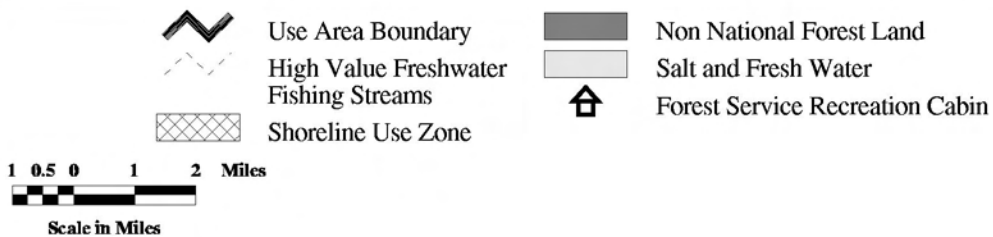
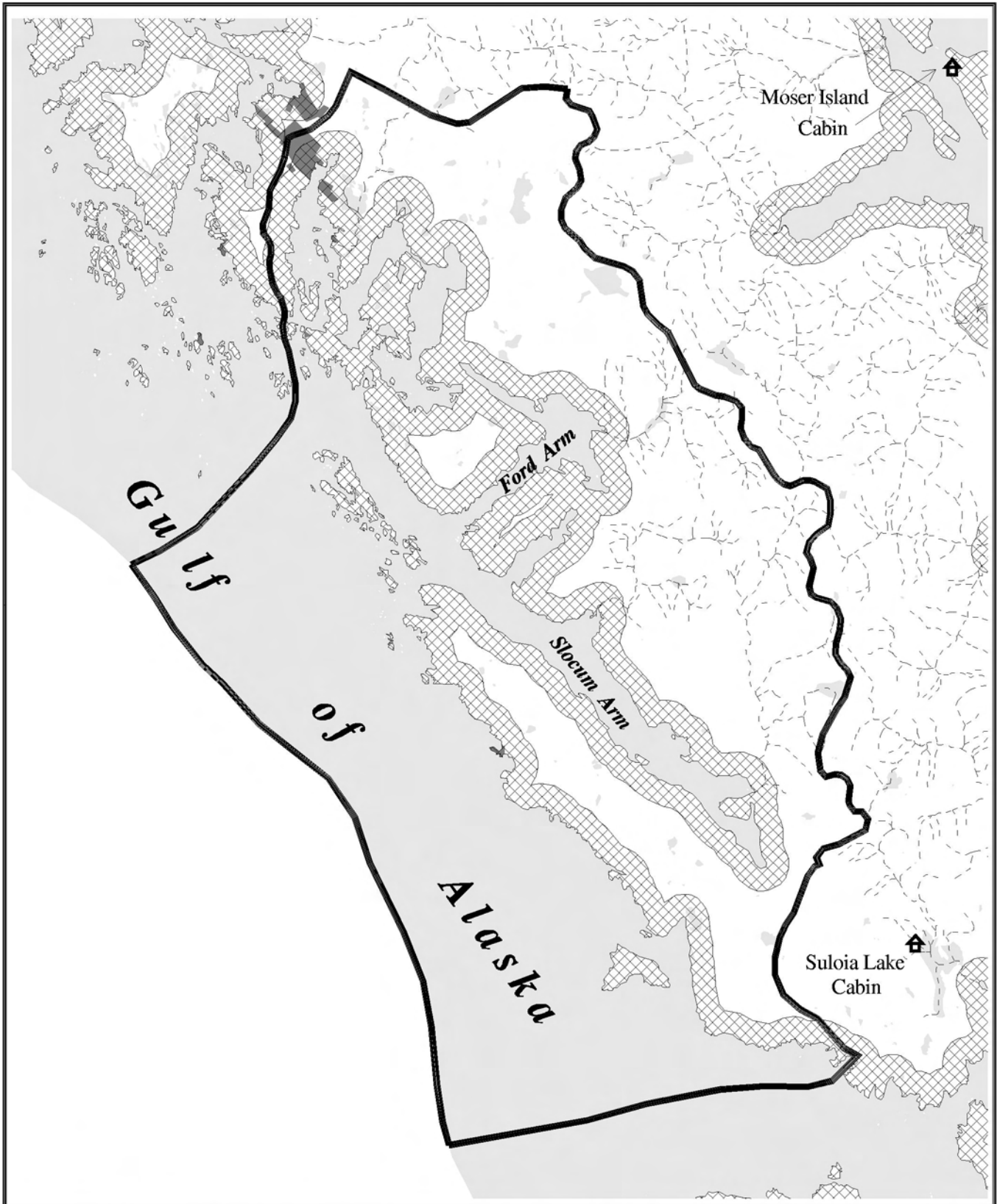
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		34	297	38	168	424	188	50	42	19	34	297	94
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Slocum Arm
Use Area - 04-14



Use Area 04-15

West Chichagof – Hoonah/Sitka Ranger Districts

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
20	840	2,120	940
<u>Description</u> <p>This area includes northwest Chichagof Island from Three Hill Island west along the outer coast of Chichagof to Khaz Bay. It includes Yakobi Island and encompasses the northern ¾ of the West Chichagof–Yakobi Wilderness. The outer coast of west Yakobi and west Chichagof islands is characterized by an extremely rocky shoreline with intermittent coves and tiny islands. Storms coming directly from the Gulf of Alaska can make the area very treacherous for boaters. South of Point Urey are numerous coves, rocky islands, streams, and inland lakes. It also includes the inside waterways of Lisianski Inlet, Lisianski Strait, and Stag Bay.</p> <p>LUDs LUD II, LUD II Wild River, Semi Remote Recreation, and Wilderness</p> <p>ROS Primitive, Rural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 604 miles</p> <p>National Forest Shoreline Acres 66,022 acres</p> <p>Communities The community of Pelican is situated along the east shore of Lisianski Inlet. Private property adjacent to Pelican expands out across 10 miles of shoreline and includes several remote inholdings isolated from the city boundary.</p> <p>Alaska Coastal Management Act This use area includes the district boundary for the City of Pelican Coastal Management Plan.</p>			
<u>Forest Service Facilities</u> <p>Public Recreation Cabins Greentop, White Sulphur Springs, and Goulding Lakes Cabins</p> <p>Trails Greentop, Stag Bay, Stag River, Lisianski River, Takanis Lake, White Sulphur Springs, Mirror Harbor, Dry Pass, Didrickson, and Goulding Lakes</p>			
<u>Non-National Forest System Lands</u> <p>Non-National Forest System lands include: Soapstone Cove, Cape Bingham, Ewe Ledge, and Mite Cove on North Yakobi Island; the City of Pelican and adjacent private properties in Lisianski Inlet; and Kimshan Cove on west Chichagof Island.</p>			
<u>Recreation Use</u> <p>Area Attractions Anadromous fish streams, White Sulfur Hot Springs, Greentop Cabin, and remote rugged setting of the outer coast</p> <p>Commercial Use Brown bear hunting, freshwater fishing, camping, sightseeing, commercial fishing, recreational boaters and kayakers, boat-based outfitter/guides, boat-based subsistence use, and boat-based sport fishing</p> <p>Non-commercial Use Hunting, hiking, sightseeing, and kayak camping</p>			

Use Area 04-15

West Chichagof – Hoonah/Sitka Ranger Districts

Primary Use Areas	Three Hill Island is a popular location for mid-size cruise ships and residents of Elfin Cove. Lisianski River, Stag Bay, and various places along Lisianski Inlet and Lisianski Strait receive consistent use, along with the Chichigof Wilderness Area. West Yakobi includes the popular recreation places of Hoktaheen Cove, Deer Harbor, Squid Bay, Takanis Bay, and Greentop Harbor. Popular recreation areas include Porcupine Bay, White Sulfur Hot Springs, Sea Level Slough, Goulding Harbor, Dry Pass, Black Bay, Bertha Bay, and Portlock Harbor.
Areas of Concern	Lisianski River is a recommended Wild River. Perceptions of crowding and motor craft use on Lisianski River. Use at White Sulphur Springs.
<u>Management/Resource Considerations</u>	
Subsistence	An annual average of 98 subsistence fishing permits have been returned for use at Surge Bay, Hoktaheen Cove, Lisianski River, Tkanis Bay, and Klag Bay. Hoktaheen Lake and the associated outlet stream produce a significant return of sockeye salmon. Hoktaheen sockeye harvest is important for residents of small communities in the Cross Sound area including Hoonah, Pelican, and Elfin Cove. Two nearby systems on West Yakobi Island, Surge Bay and Takanis Bay, have minor subsistence harvests. To ensure adequate escapement, harvest restrictions have been placed on all the above streams. There are no anticipated restrictions on subsistence resource users due to this project.
Wildlife	Three NMFS-identified Steller sea lion haul outs are located in this use area. In this use area, 45 bald eagle nests are mapped.
Fisheries	<p>In this use area, 106 Class I streams have been mapped, of which 12 streams are identified as having high fishing values. Hoktaheen Lake and the associated outlet stream produce a significant return of sockeye salmon. Hoktaheen Lake is 126 acres in area and the outlet stream is approximately 1.5 miles long. The average reported subsistence harvest over the 1995-1999 period was approximately 1,100 fish from an average of 45 permits. Hoktaheen sockeye harvest is important for residents of small communities in the Cross Sound area including Hoonah, Pelican, and Elfin Cove. Two nearby systems on West Yakobi Island, Surge Bay and Takanis Bay, have minor subsistence harvests.</p> <p>Harvests of sockeye from the Hoktaheen system have increased dramatically in recent years from an average of 406 during the 1988-1994 period to an average of 1,222 fish during 1995-1999. There has been recent concern that the system may be over harvested. If harvest trends continue to increase, the stock may be at risk to decline. In response to increasing harvest trends, ADF&G management staff restricted subsistence and sport fisheries in 1999 and 2000 as a precautionary measure and sought funding for stock assessment programs to provide information necessary to assess the stock status and current regulations. Beginning with the 1999 season, the department reduced the season by permits allowing harvest from June 1-July 20, ensuring that the final 20% of historic run timing would be available for escapement. Similar action was taken at Surge Bay and Takanis Bay.</p>
Botany	Twenty-eight surveys covering four miles of shoreline revealed <i>Poa norbergii</i> in the rocks next to a beach and <i>Rhododendron camtschaticum</i> was found in a muskeg just back from a beach.
Cultural/Heritage	In this use area, 12 historic and 10 prehistoric sites were identified from 61 surveys that covered 19.25 miles.

Use Area 04-15

West Chichagof – Hoonah/Sitka Ranger Districts

Alternative Comparisons

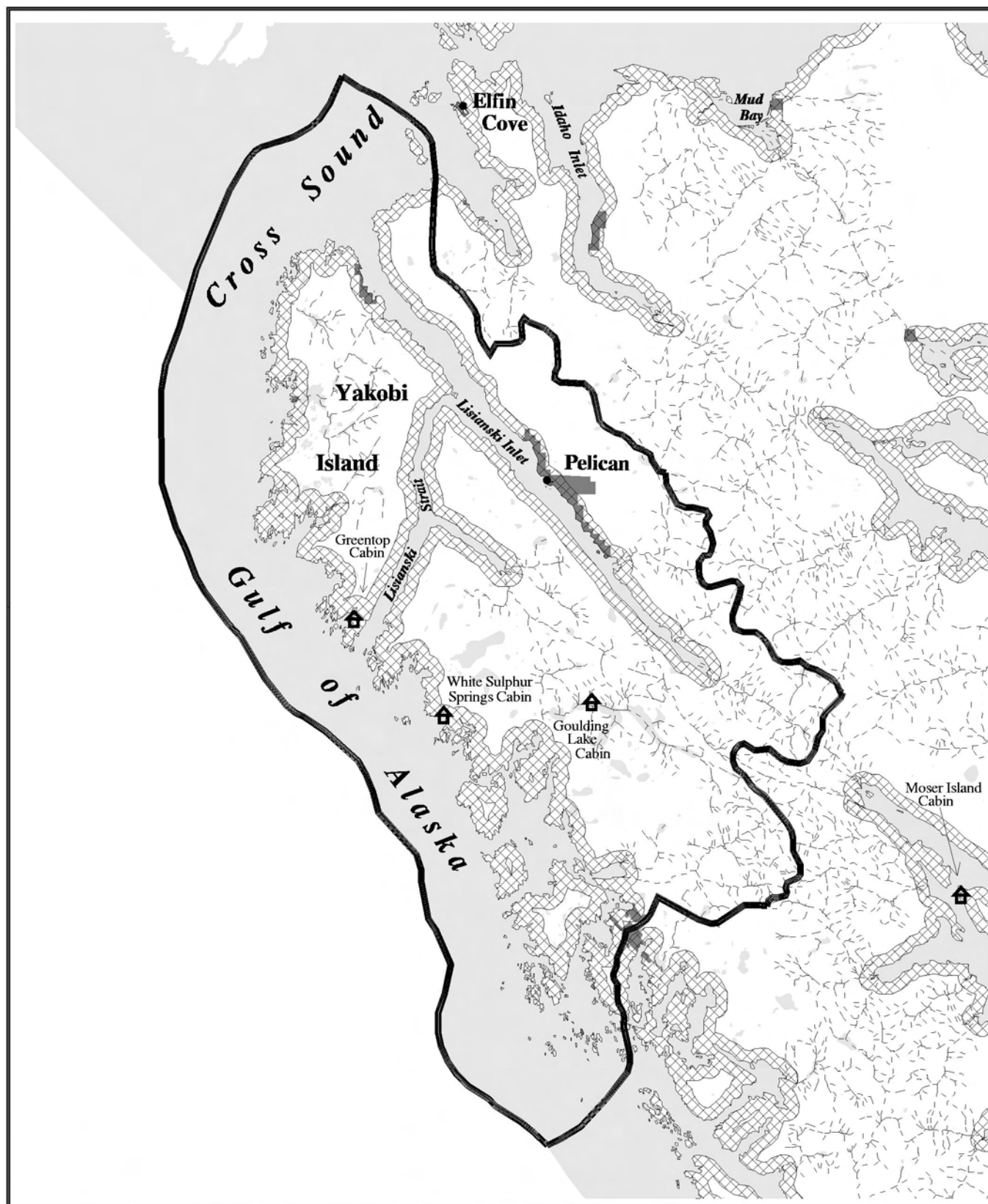
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		84	636	94	420	1,060	470	42	199	47	84	636	235
<i>Enclaves</i>	N/A	None			Three Hill Island			Three Hill Island			Three Hill Island		
					Bohemia Basin						Bohemia Basin		
<i>15% Areas</i>	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Outfitter/guide use will not displace unguided users at White Sulphur Springs Bathhouse.

West Chichagof Use Area - 04-15



Use Area Boundary
High Value Freshwater
Fishing Streams
Shoreline Use Zone



Non National Forest Land
Salt and Fresh Water
Forest Service Recreation Cabin



10.50 1 2 Miles
Scale in Miles

Use Area 04-16A

Point Adolphus (North Chichagof) – Hoonah Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area includes the popular areas of Point Adolphus and Pinta Cove. Point Adolphus is the northern most point on Chichagof Island bound by the waters of Icy Strait and receives some of the highest levels of remote recreational use on the Tongass. Opportunities for wildlife viewing, particularly humpback whales, attract increasing numbers of visitors each year. For this reason, this area is being managed as one of the smallest sub-units of the project area.</p> <p>LUDs LUD II and Old Growth</p> <p>ROS Semi-Primitive Motorized and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 11 miles</p> <p>National Forest Shoreline Acres 3,078 acres</p> <p>Communities None</p>			
<u>Forest Service Facilities</u> <p>Shelters Pinta Cove</p>			
<u>Non-National Forest System Lands</u> <p>None</p>			
<u>Recreation Use</u> <p>Area Attractions Wildlife viewing opportunities, especially humpback whales; camping; and scenic setting</p> <p>Commercial Use Brown bear hunting, camping, freshwater fishing, and sightseeing</p> <p>Non-commercial Use This is an important recreation area for the residents of Hoonah, Gustavus, Elfin Cove, and Pelican activities include kayak tent camping and day hiking.</p> <p>Use Patterns This area receives a variety of boat-based use from both commercial and non-commercial operators. Offshore boat traffic consists of large cruise ships; commercial fishing boats; chartered sport fishing and whale watching vessels; local and non-resident pleasure boats engaged in subsistence, fishing, wildlife viewing, or transiting between communities and other recreation areas and tour boats. Recreational access to the national forest via saltwater includes kayak transporters; commercial kayak outfitter/guides; non-commercial kayakers; tour boats dropping off groups by kayak or small skiff; local small craft sightseeing and hiking; local and non-resident pleasure boaters going ashore by small skiff; commercial outfitter guides engaged in sightseeing, hiking, and bear hunting.</p> <p>Primary Use Areas Eagle Beach, Point Adolphus, Pinta Cove, and Pinta Point</p> <p>Areas of Concern Impacts from campsites</p>			

Use Area 04-16A

Point Adolphus (North Chichagof) – Hoonah Ranger District

Management/Resource Considerations

Subsistence

There are no anticipated restrictions on subsistence resource users.

Wildlife

In this use area, 11 bald eagle nests are mapped. The entire use area is within the Alaska Board of Game Northeast Chichagof Controlled Use Area for state and federal management of brown bears.

Fisheries

Four Class I streams are mapped; however, no streams were identified with high freshwater fishing values.

Botany

Eight surveys covering 1.5 miles of shoreline revealed *Botrychium linaria* and *B. minganense* within beach meadows.

Cultural/Heritage

Eight surveys that covered five miles revealed no sites in this area.

Alternative Comparisons

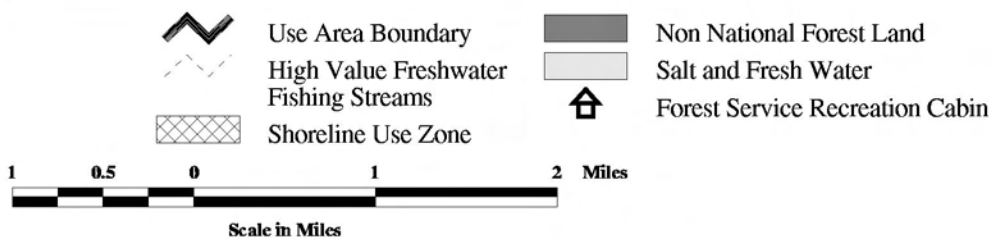
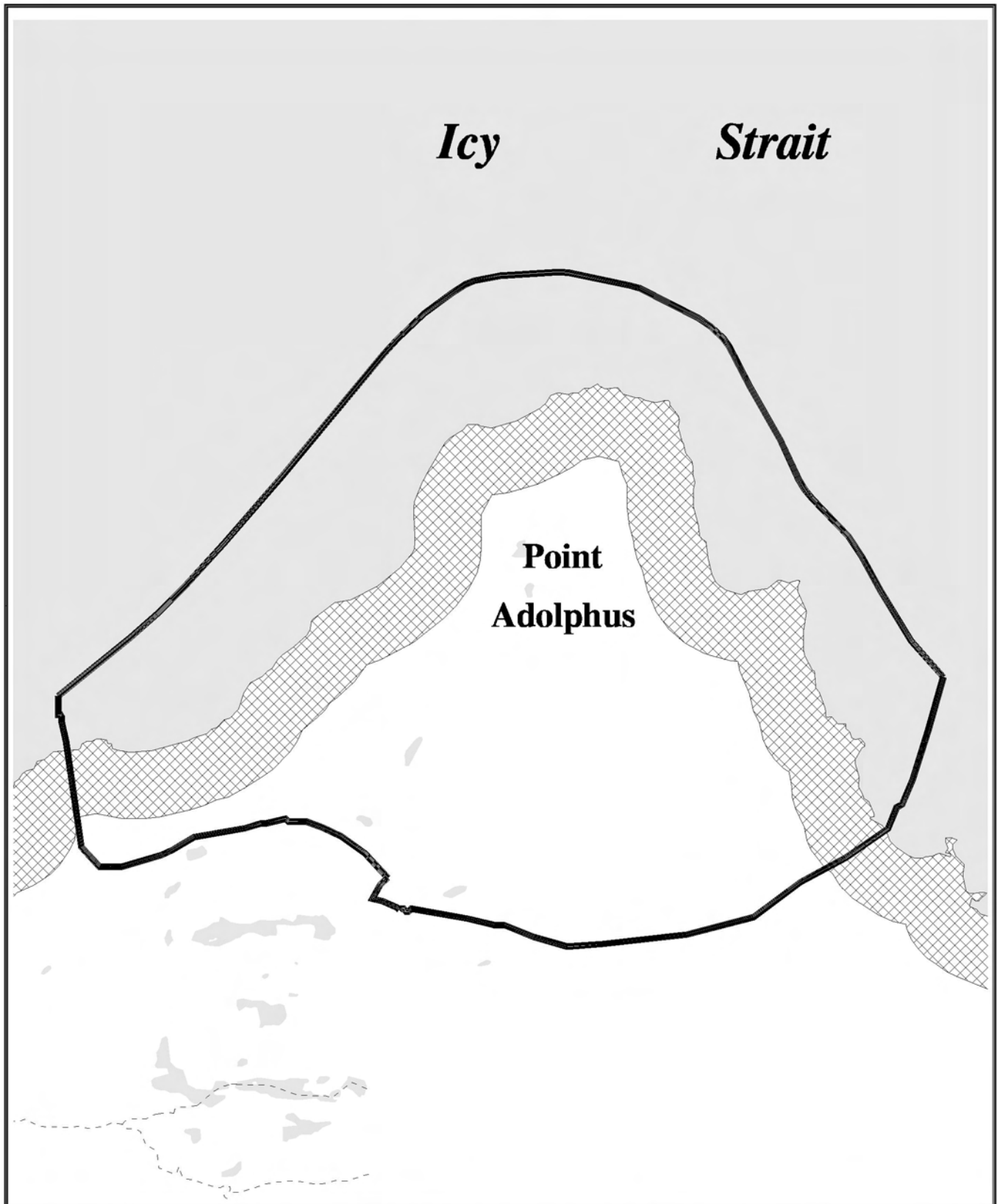
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	159	28	126	318	141	15	159	15	25	254	71
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			Pinta Cove			Pinta Cove			Pinta Cove		
					Damp Marker			Damp Marker			Damp Marker		

Mitigation

See Appendix C for mitigation measures.

Outfitter/guide use will not displace unguided users at Pinta Cove shelter.

Point Adolphus
Use Area - 04-16A



Use Area 04-16B

Mud Bay (North Chichagof) – Hoonah Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This Use Area was defined to include the relatively small management area of Mud Bay. Mud Bay is a popular recreation place and lies within 30 boat miles from Hoonah, Gustavus, and Elfin Cove. Shoreline included in this area runs from Damp Marker (between Point Adolphus and Mud Bay) and continues west to Gull Cove at the entrance to Idaho Inlet including Goose Island.</p> <p>LUDs LUD II</p> <p>ROS Semi-Primitive Motorized and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 34 miles</p> <p>National Forest Shoreline Acres 6,579 acres</p> <p>Communities None</p> <p>Alaska Coastal Management Act Outside of any coastal district boundaries</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>Private property includes areas located west of Mud Bay River, two private lodges at Gull Cove, and two hunter cabins under Special Use permit in Mud Bay.</p>			
<u>Recreation Use</u> <p>Area Attractions Fishing, good boat anchorage, scenic setting, and wildlife viewing</p> <p>Commercial Use Brown bear hunting, freshwater fishing, camping, and sightseeing</p> <p>Non-commercial Use This is an important recreation area for the residents of Hoonah, Gustavus, Elfin Cove, and Pelican. Fishing, sightseeing, camping, and hunting</p> <p>Use Patterns Boat based use to access Mud Bay River including: small craft, kayak, prop boats, and jet boats. Wheeled and floatplanes are used to access the area.</p> <p>Primary Use Areas Gull Cove, Mud Bay, and Mud Bay River</p> <p>Areas of Concern Guided use levels on Mud Bay River and motorized boat use on the Mud Bay River</p>			

Use Area 04-16B

Mud Bay (North Chichagof) – Hoonah Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions on subsistence resource uses due to this project.
Wildlife	In this use area, 16 bald eagle nests are mapped. The entire use area is within the Northeast Chichagof Controlled Use Area for state and federal management of brown bears.
Fisheries	In this use area, 12 Class I streams have been mapped, of which five streams were identified with high fishing values.
Botany	Eight surveys covering 1.5 miles of shoreline revealed <i>Botrychium lunaria</i> and possibly one another <i>Botrychium</i> species.
Cultural/Heritage	Two historic and two prehistoric sites were identified during six surveys that covered 2.5 miles.

Alternative Comparisons

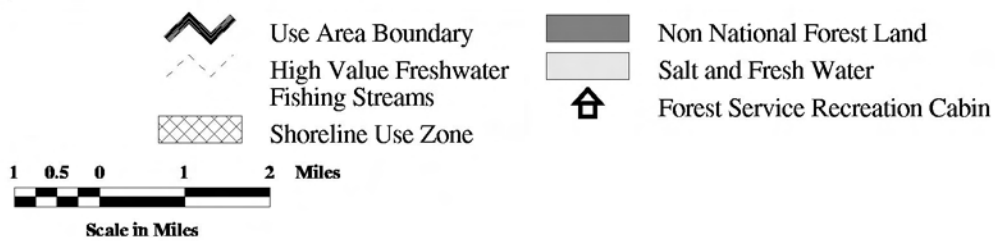
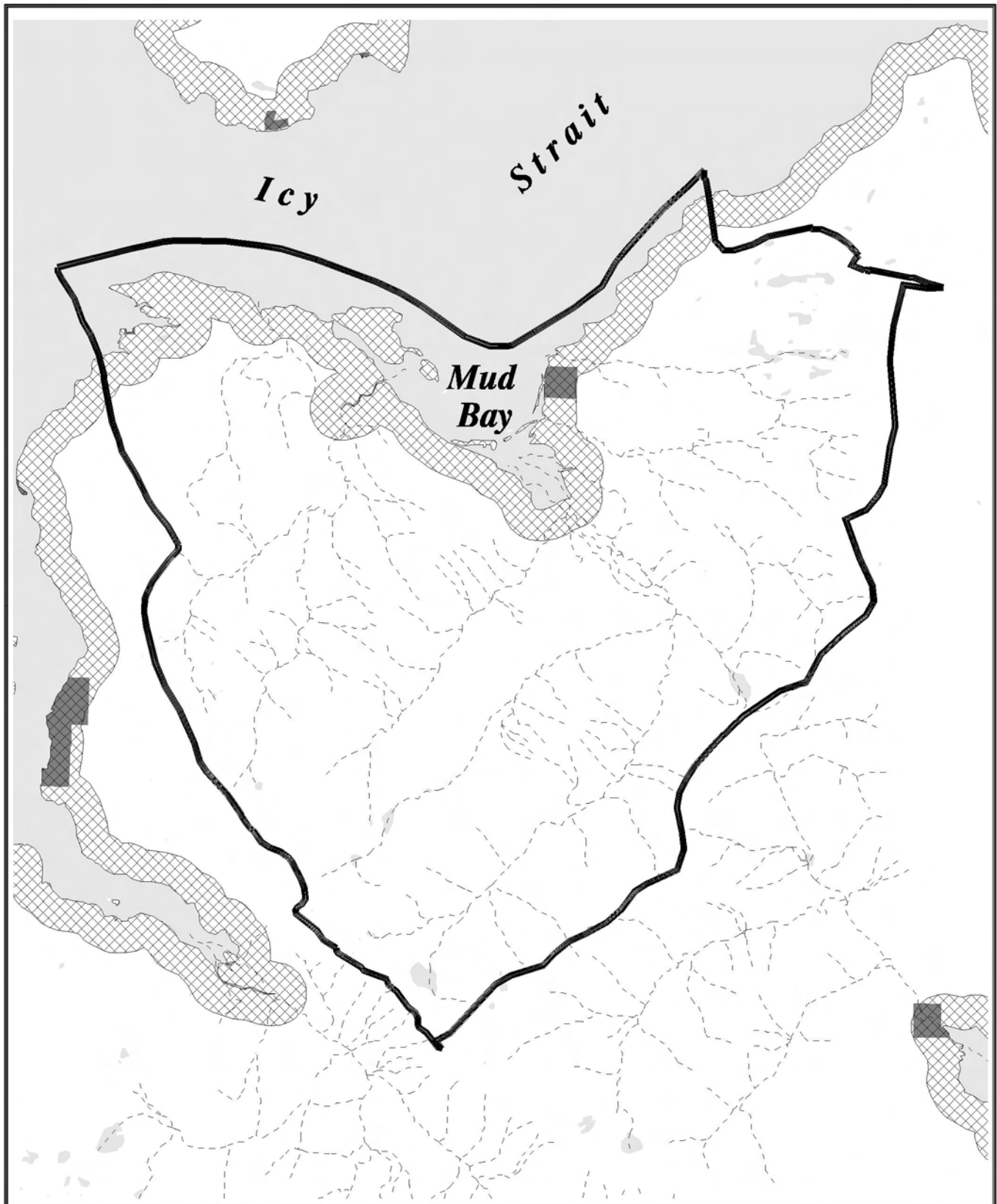
	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	159	28	126	318	141	21	159	15	25	254	71
Enclaves	N/A	None			None			None			None		
15% Areas	N/A	None			None			None			None		

Mitigation

See Appendix C for mitigation measures.

Wheeled plane landings at Mud Bay will be permitted at the frequency provided by the selected alternative.

Mud Bay
Use Area - 04-16B



Use Area 04-16C

Idaho Inlet (Northwest Chichagof) – Hoonah Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This area was defined to include Idaho Inlet, the Shaw Islands, and the Trail River Estuary.</p> <p>LUDs LUD II and Semi-Remote Recreation</p> <p>ROS Primitive, Semi-Primitive Non-Motorized, Semi-Primitive Motorized, and Roaded Natural</p> <p>National Forest Shoreline Miles 36 miles</p> <p>National Forest Shoreline Acres 9,769 acres</p> <p>Communities There is a tiny resident community of approximately 3–4 homes located on the northeast shoreline of Idaho Inlet. There are no private lodges within this use area.</p>			
<u>Forest Service Facilities</u> <p>None</p>			
<u>Non-National Forest System Lands</u> <p>One private residence at Nip-n-Tuck and one hunter cabin on the west shore of central Idaho Inlet are under special use permit. There is State selected property on east shore of Idaho Inlet.</p>			
<u>Recreation Use</u> <p>Area Attractions Trail River is a highly productive anadromous fish stream. Wildlife viewing, scenic setting, long estuary flats, and good anchorage at the head of the bay</p> <p>Commercial Use This area has received a steady increase in use over the last several years. In 1999, the Idaho Inlet area reported one of the highest levels of guided use within the north Tongass Shoreline EIS project area activities include brown bear hunting, freshwater fishing, camping, and sightseeing.</p> <p>Non-commercial Use Fishing, hunting, and sightseeing</p> <p>Use Patterns Commercial and non-commercial users anchor at the head of the bay accessing Trail River by small craft for hunting, sightseeing, and fishing. Mid-size cruise ships anchor at the head of the bay where clients can hike in the estuary flats and Marble Creek or kayak in the bay.</p> <p>Primary Use Areas Fox Creek, Idaho Inlet, Marble Creek, and Trail River</p> <p>Areas of Concern Motorized watercraft use on Trail River</p>			

Use Area 04-16C

Idaho Inlet (Northwest Chichagof) – Hoonah Ranger District

Management/Resource Considerations

<i>Subsistence</i>	There are no anticipated restrictions on subsistence resource uses due to this project.
<i>Wildlife</i>	In this use area, 34 bald eagle nests are mapped.
<i>Fisheries</i>	In this use area, 25 Class 1 streams have been mapped with only one stream, Trail River, identified with high fishing values. Trail River was identified as having potential habitat concerns due to motorized watercraft. See Appendix C for mitigation measures.
<i>Botany</i>	Eight surveys covering 1.5 miles of shoreline. No rare or sensitive plants were found.
<i>Cultural/Heritage</i>	Two historic sites and one prehistoric site were identified during eight surveys that covered 2.25 miles.

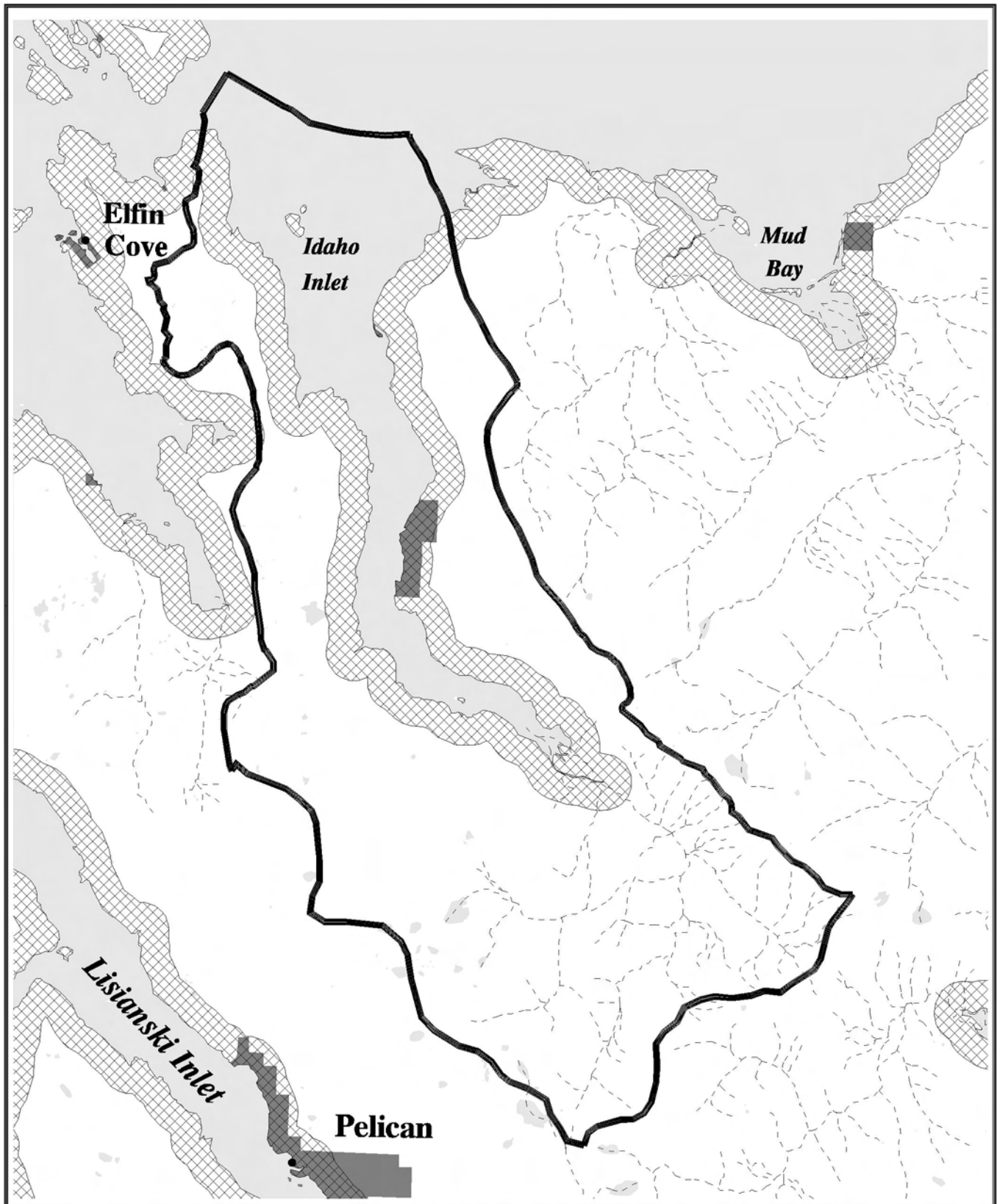
Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
<i>Commercial Allocation (groups by season)</i>	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	159	28	126	318	141	16	159	21	25	159	71
<i>Enclaves</i>	N/A	None			None			None			None		
<i>15% Areas</i>	N/A	None			Big Shaw Island								
					Fox Creek			Fox Creek			Fox Creek		

Mitigation

See Appendix C for mitigation measures. .

Idaho Inlet
Use Area - 04-16C



Use Area Boundary



High Value Freshwater
Fishing Streams



Shoreline Use Zone



Non National Forest Land



Salt and Fresh Water



Forest Service Recreation Cabin

1 0.5 0 1 2 Miles



Scale in Miles



USE AREA
LOCATOR

Use Area 04-16D

Port Althorp – Hoonah Ranger District

<u>Recreation Carrying Capacity (total capacity for all users)</u>			
Groups at one time	Spring	Summer	Fall
6	252	636	282
<u>Description</u> <p>This use area was defined to manage the area around the community of Elfin Cove, Port Althorp, and the Lemesurier and Inian Islands Wilderness Areas. It also includes the George Islands. It has a high recreational value for both commercial and non-commercial operations.</p> <p>LUDs LUD II, Semi-Remote Recreation, and Wilderness</p> <p>ROS Rural, Roaded Natural, Semi-Primitive Motorized, and Semi-Primitive Non-Motorized</p> <p>National Forest Shoreline Miles 90 miles</p> <p>National Forest Shoreline Acres 15,853 acres</p> <p>Communities This use area includes the community of Elfin Cove. This tiny fishing village has a fluctuating population of approximately 125 people during the summer season, composed primarily of seasonal private lodges that provide ocean sport fishing charters, stream fishing, and sightseeing tours. The population decreases during winter to about 25 year round residents. This isolated village is accessible by floatplane or boat only and has no ferry service.</p>			
<u>Forest Service Facilities</u> <p>Trails George Islands WWII Cannon Trail and Lemesurier Island Trail</p>			
<u>Non-National Forest System Lands</u> <p>This use area includes the community of Elfin Cove, one private inholding at Margaret Creek in Port Althorp; two private inholdings on Lemesurier Island at Jacks Cove and Willoughby Cove; and two private inholdings at Inian Island at Hobbit Hole and Inian Cove.</p>			
<u>Recreation Use</u> <p>Area Attractions Scenic setting, Icy Strait, Elfin Cove, marine and terrestrial mammal viewing opportunities, sea bird watching, and safe anchorage in Port Althorp</p> <p>Commercial Use Freshwater fishing, camping, and sightseeing</p> <p>Non-commercial Use Oyster farm in Port Althorp, fishing, and hunting</p> <p>Use Patterns This area is a travel corridor for commercial vessels, recreationists, and local residents of the communities of Pelican, Elfin Cove, Gustavus, and Hoonah. Tour boats frequent the George Islands.</p> <p>Primary Use Areas Granite Cove and Port Althorp</p> <p>Areas of Concern George Island WWII Cannon Trail is in poor condition. Site hardening is necessary if use increases or continues at current levels.</p>			

Use Area 04-16D

Port Althorp – Hoonah Ranger District

Management/Resource Considerations

Subsistence	There are no anticipated restrictions on subsistence resource use due to this project.
Wildlife	NMFS identified one Steller sea lion haul-out in this use area. Although not mapped it is assumed that bald eagle nests are located along the shoreline in numbers at least equal to surveyed areas to the east of this use area. The Port Althorp state and federal closed area is closed to taking brown bears.
Fisheries	Six Class I streams were mapped, two of which have high freshwater fishing values.
Botany	Five surveys covering one mile of shoreline revealed <i>Botrychium lunaria</i> , <i>B. virginianum</i> , and <i>B. minganense</i> have been found in beach meadows.
Cultural/Heritage	One historic and one prehistoric site were identified during eight surveys that covered three miles.

Alternative Comparisons

	Alt. 1	Alt. 2			Alt. 3			Alt. 4			Alt. 5		
Commercial Allocation (groups by season)	N/A	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall	Spr	Sum	Fall
		25	159	28	126	318	141	15	156	15	25	159	71
Enclaves	N/A	None			George Island			George Island			George Island		
15% Areas	N/A	None			None			None			None		

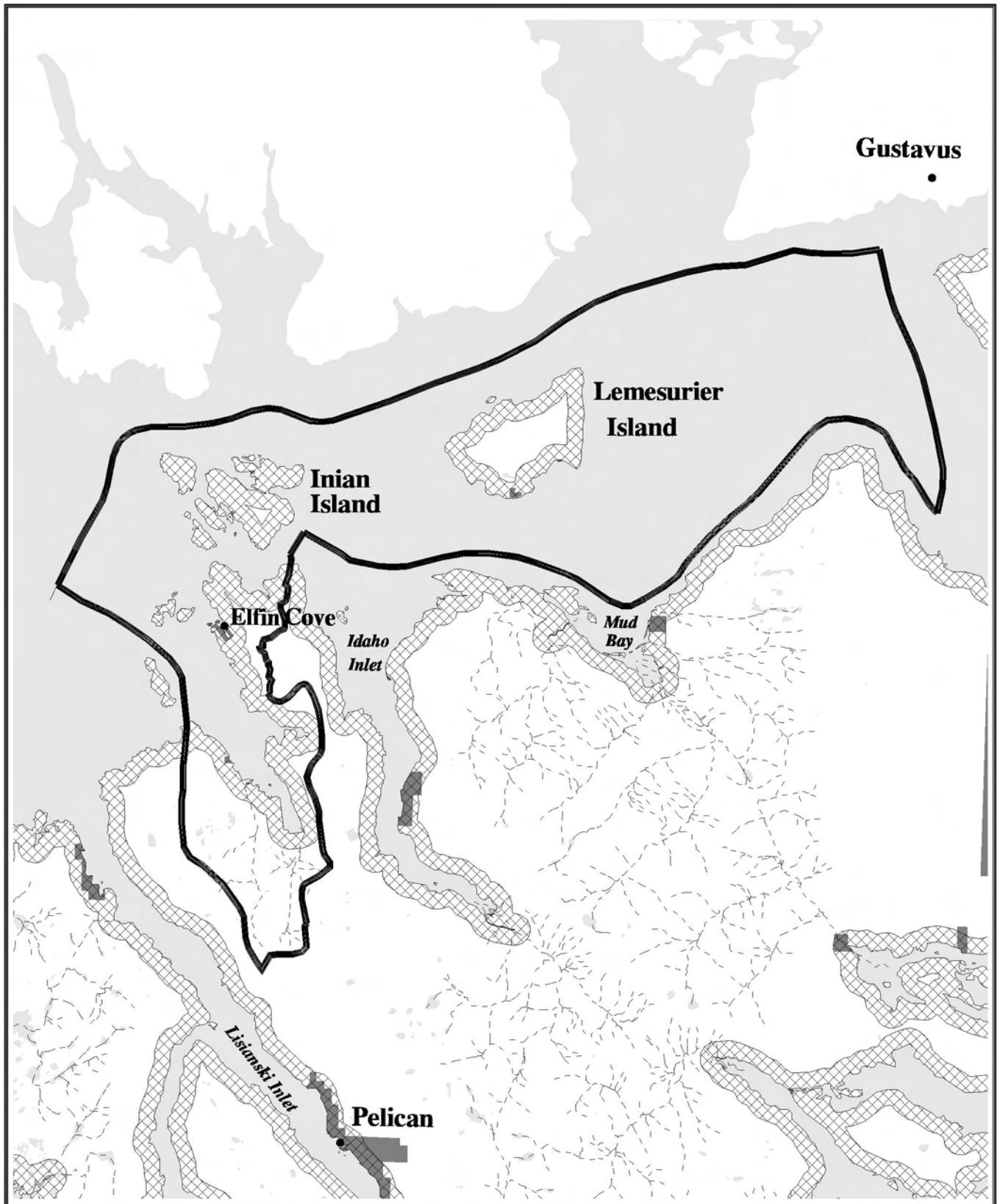
Mitigation




See Appendix C for mitigation measures.




Additional outfitter/guide use levels on the George Island WWII Cannon trail will not be permitted until the trail has been reconstructed.


The Port Althorp area is closed to brown bear hunting south of a line from Point Lucan to Salt Chuck Point.

Port Althorp
Use Area - 04-16D



-  Use Area Boundary
-  High Value Freshwater Fishing Streams
-  Shoreline Use Zone

-  Non National Forest Land
-  Salt and Fresh Water
-  Forest Service Recreation Cabin

1 0.5 0 1 2 Miles

Scale in Miles



Appendix A—Use Area Cards



Appendix B

Large Group Area Cards

Appendix B

Large Group Area Cards

In this EIS, Large Group Areas are specific areas where larger groups of 21–75 people may be allowed. Smaller size groups are also allowed. Guides will be counted as part of a group, when determining the overall group size. The two types of large group areas are Enclaves and Fifteen-Percent areas. Enclaves are areas where large groups can occur on a regular basis throughout all seasons. Fifteen-Percent areas are places where large groups can occur only on an occasional basis, for less than 15 percent of the time during the summer season.

The following Large Group Area cards provide site-specific information and resource considerations relating to commercial recreation management for these areas. They support the information provided in Chapters 2 and 3. Most resource concerns are mitigated through measures listed in Appendix C, which apply to outfitter/guide recreation use across the analysis area. Mitigation measures are not repeated in this section.

Figure B-1 displays the location of the large group areas. No guided large groups will be allowed to camp in these large group areas. No guided recreation activities involving the consumption of resources such as fishing, hunting, or plant gathering will be allowed by large groups in these areas.

The information on these cards will be used to prepare and administer outfitter/guide permits. Where applicable, the mitigation measures will be incorporated into the document as permit stipulations. Permit conditions will be enforced through monitoring and permit administration.

Table B-1. List of Large Group Areas

ENCLAVES			
Use Area	Name of Large Group Area	Use Area	Name of Large Group Area
01-01	Katzehin Falls	04-04A	Point Elizabeth
01-02	Sullivan Mountain	04-04A	Rodman Bay
01-03	Cant Cove	04-04A	Saook Bay
01-03	Howard Bay	04-04B	Hanus Bay
01-04C	Sunny Cove	04-04B	Portage Arm
01-05B	Mallard Cove	04-08	Cordwood Creek
01-05B	No Name Cove/Williams Cove	04-08	Fowler Creek
01-05B	Point Anmer	04-11	Eight Fathom Dock
01-05B	West Gilbert Bay	04-11	Kennel Creek
01-05C	Fanshaw	04-11	Red Cliff Islands
01-05C	North Windham Bay	04-11	Salt Lake Bay Dock
01-05C	Port Houghton	04-12	Corner Bay Road
01-05C	Sand Bay	04-13	Sitkoh Bay Road
04-03	Dry Pass	04-15	Bohemia Basin
04-03	Eagle River Road	04-15	Three Hill Island
04-03	Noxon	04-16D	George Island
04-04A	Lake Eva Trail		

Appendix B—Large Group Areas

Table B-2. List of Large Group Areas

FIFTEEN-PERCENT AREAS			
Use Area	Name of Large Group Area	Use Area	Name of Large Group Area
01-05B	Point Coke	04-11	Neka Bay South Bight
04-03	Fish Bay	04-13	Nismeni Point
04-03	Nadezhida Islands	04-16A	Damp Marker
04-04A	Duffield	04-16A	Pinta Cove
04-04B	Bourbon Creek Road	04-16C	Big Shaw Island
04-11	Iyoukeen Peninsula	04-16C	Fox Creek
04-11	Neka Bay North Bight		

(See Table B-3 for a listing of Large Group Areas Considered But Eliminated)

Vicinity Map
Shoreline Outfitter/Guide FEIS
Analysis Area

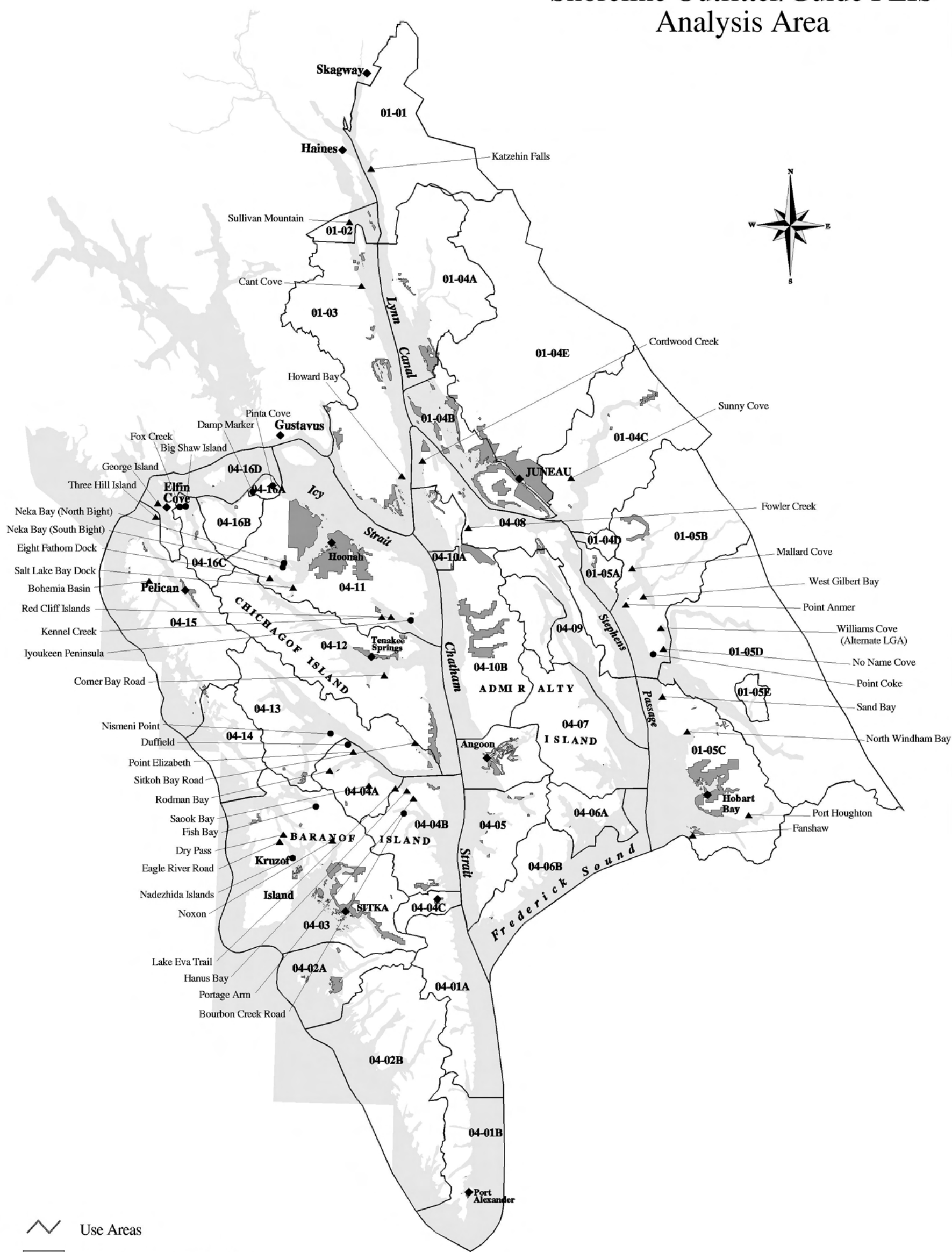


Figure B-1

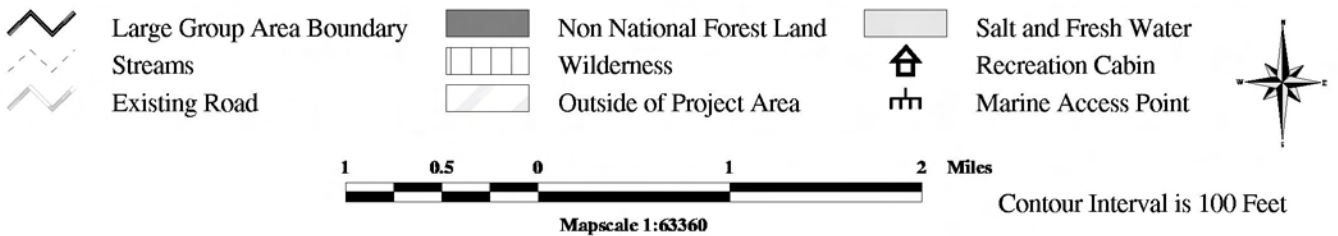
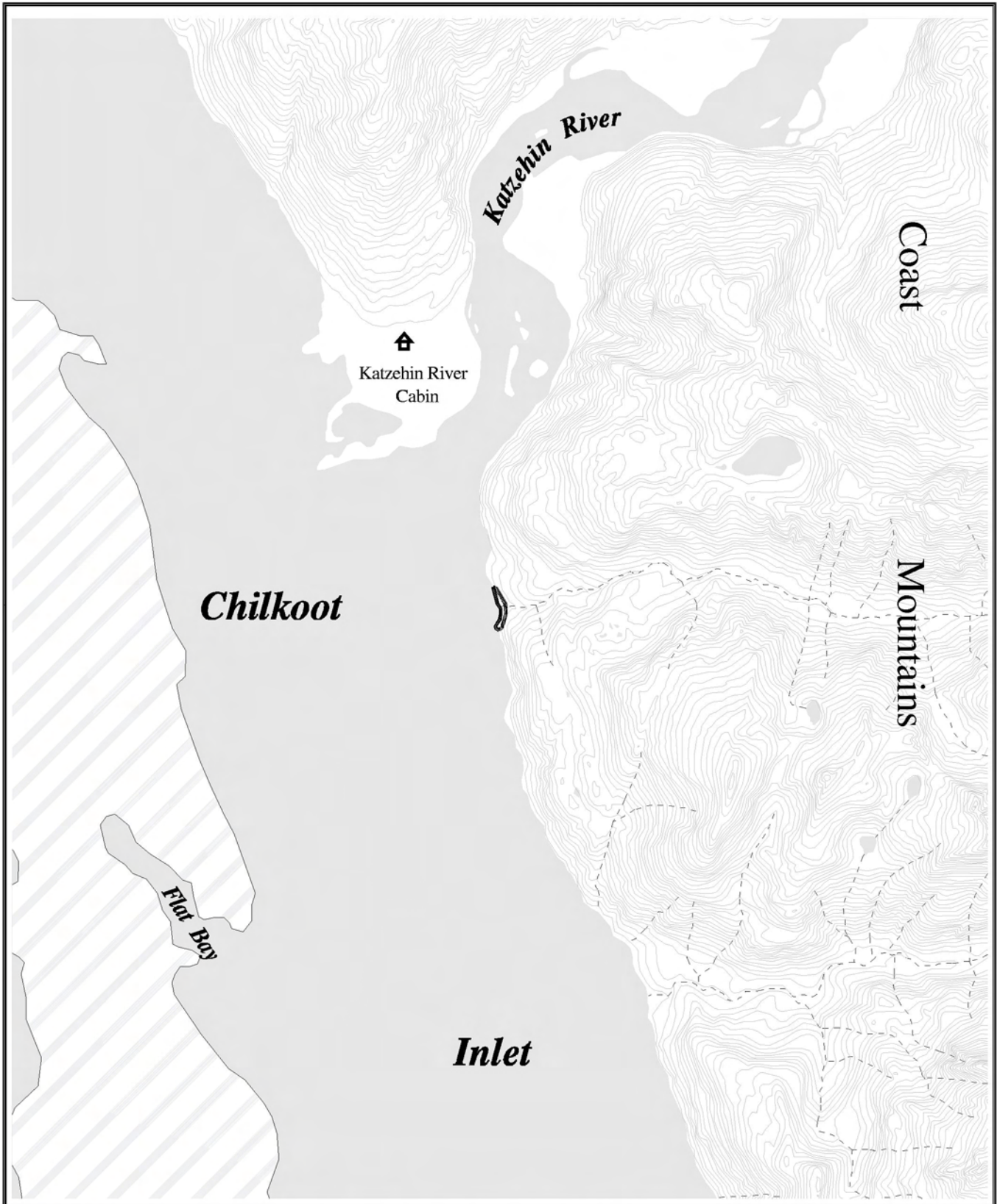
Large Group Areas—Appendix B



Appendix B—Large Group Areas

Large Group Area	
Katzehin Falls Alternatives 3,5	
Type	Enclave
Use Area	01-01
LUD	Semi-Remote Recreation, Transportation and Utility System Corridor
ROS	Roaded Natural
Acres	7
General Characteristics	<p>This site is located south of the Katzehin River on the east side of Lynn Canal. Topography in this area is generally steep, rocky, and forested. A large waterfall empties into a narrow tidal area near the site. South of the falls and inside the tree line the understory is open. The lower two miles of the river are not included in the recommendation for Wild and Scenic River Corridor status, due in part to the proposed state road between Juneau and Skagway.</p>
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	<p>There is little protection at this site except on relatively calm days. Silt outwash from the Katzehin River and creek has created a shallow approach. Steep terrain confines use to the narrow beach and just inside the tree line. The creek has a strong flow and crossing on foot is not recommended. Proximity to frequent boat traffic, as well as the Alaska Marine Highway was the rationale in TLMP for mapping this as "Roaded Natural".</p>
Facilities	None
Concerns and/or Opportunities	<p>Bear sign was noted along the creek. Due to site size and natural features, there are no opportunities to avoid animals when they are present. At one time, the state had selected this parcel for a potential ferry terminal. The Department of Transportation is no longer interested in the parcel for this purpose.</p>
Attractions	<p>This area features a large waterfall, sandy beaches, and an excellent view across Lynn Canal towards the Chilkat Mountains and a hanging glacier. A large stump was found below the high tide mark, a remnant of a period of glacial retreat. This area provides an opportunity for viewing shorebirds.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Brown bear viewing ○ Vegetation ○ Riparian
Other Management Plans	Northern Southeast Area Plan (DNR), Haines Area, Designation General Use

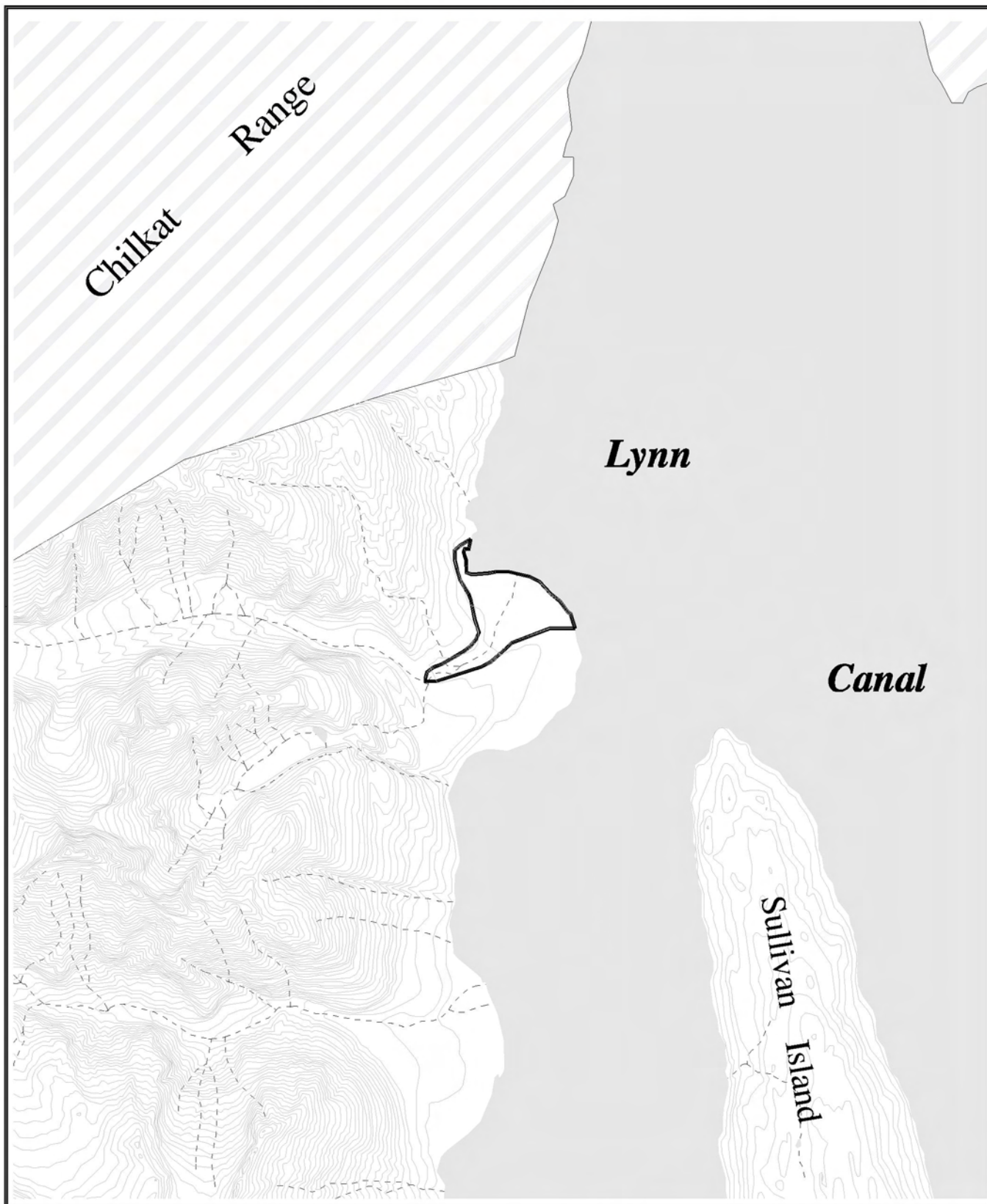
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-01 KATZEHIN FALLS



Appendix B—Large Group Areas

Large Group Areas	
Sullivan Mountain Alternative 3, 5	
Type	Enclave
Use Area	01-02
LUD	Modified Landscape
ROS	Semi-Primitive Motorized, Semi-Primitive Non-motorized
Acres	235
General Characteristics	Located at the mouth of a braided glacial outwash creek, this site is characterized by an outwash plain comprised of glacial silt, cobble, and boulder substrate. Alder, willow, cottonwood, and spruce mark the upland flats south of the creek. Along the face of the alluvial plain to the south is a long and rocky beach bordered by a beach rye grass meadow extending to the tree line.
Historical Use	There was no reported commercial use of this site during 1999-2001. In the 1960's, timber harvest occurred on the south side of the alluvial plain within the flats.
Access	Access may be primarily by floatplane or boat. The cove may provide some protection for anchoring from winds to the south but may be more exposed from the north. Water depths are shallow in front of the creek but the beach is deeper to the south of the creek.
Facilities	None
Concerns and/or Opportunities	Potential facilities could be shielded from shoreline view by the gentle terrain. There area private land parcels in the area.
Attractions	The flora and fauna of the Chilkat Mountains
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagle ○ Riparian ○ Vegetation • Guided activities must not trespass on private land
Other Management Plans	Northern Southeast Area Plan (DNR), Haines Area, Designation General Use

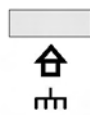
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-02 SULLIVAN MOUNTAIN



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



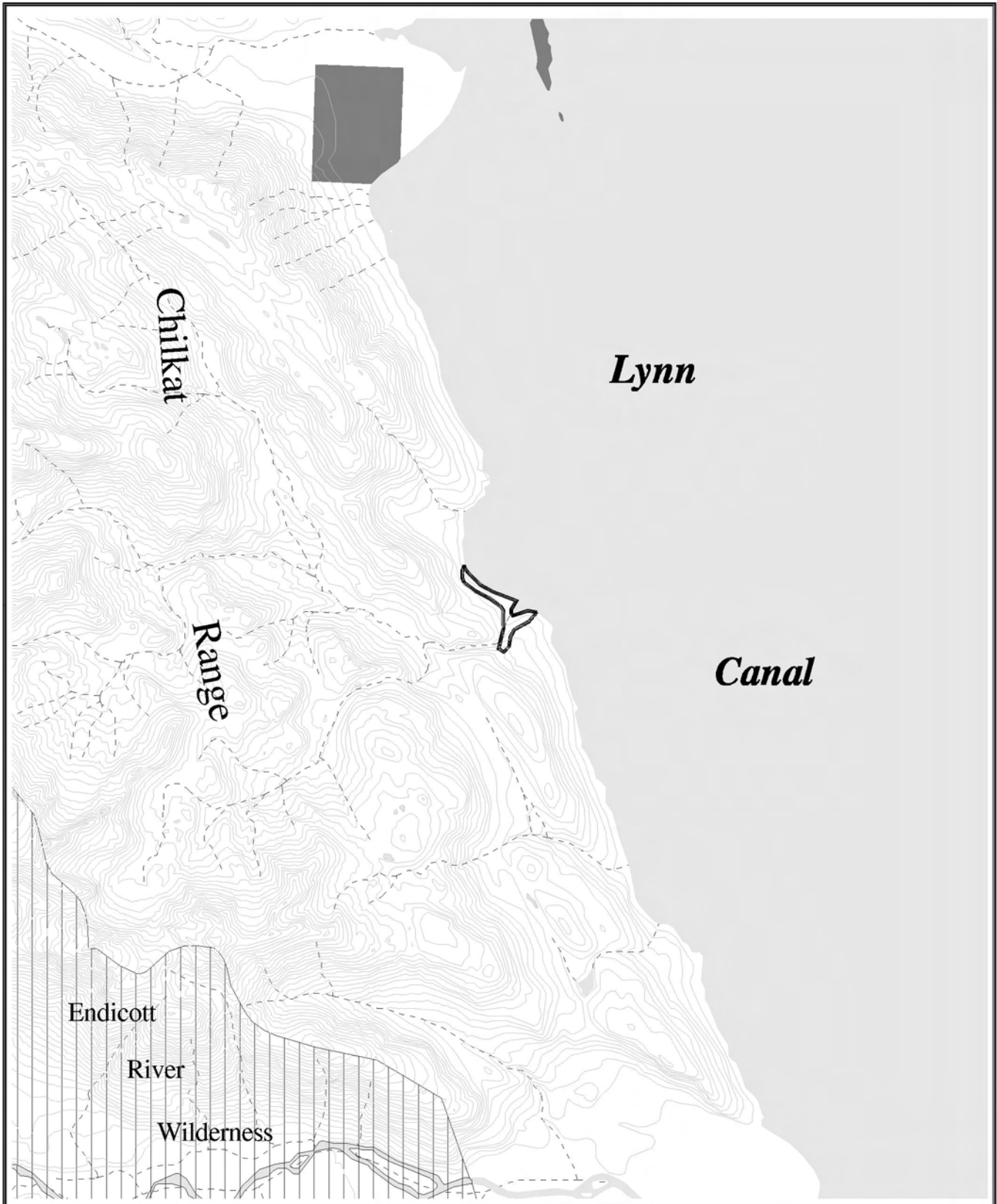
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Cant Cove Alternative 3	
Type	Enclave
Use Area	01-03
LUD	Semi-Remote Recreation
ROS	Semi-Primitive Motorized
Acres	38
General Characteristics	<p>This site on the west side of Lynn Canal is in the proposed State road corridor for the road from Juneau to Haines. A large fish-bearing stream bisects the area. This area is lined with large Sitka spruce and hardwoods with low brush and an open understory. There is an estuarine meadow behind a raised sand spit at the mouth of the creek. The southern side of the creek has a smaller meadow, and a beach with several rock formations, including a small, water-carved grotto. Though access along the stream bank is not easy due to slope and vegetation, a large waterfall is visible several hundred yards up the stream.</p>
Historical Use	There was no documented commercial use at this site in 1999 -2001.
Access	The small cove provides little protection from north and south winds on Lynn Canal. Boats or floatplanes can land on the beach. The creek can be forded in hip waders. The main channel is deeper in the creek mouth allowing access to the shore behind the sand spit.
Facilities	None
Concerns and/or Opportunities	Because vegetation and topography limit sight distances, there is some potential for human/bear conflict. There may be karst located in the area. There is a rock grotto.
Attractions	Narrow ½ mile long beach, large waterfall, rock formations
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation ○ Brown bear viewing ○ Karst and caves
Other Management Plans	Northern Southeast Area Plan (DNR), Haines Area, Designation General Use

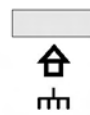
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-03 CANT COVE



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



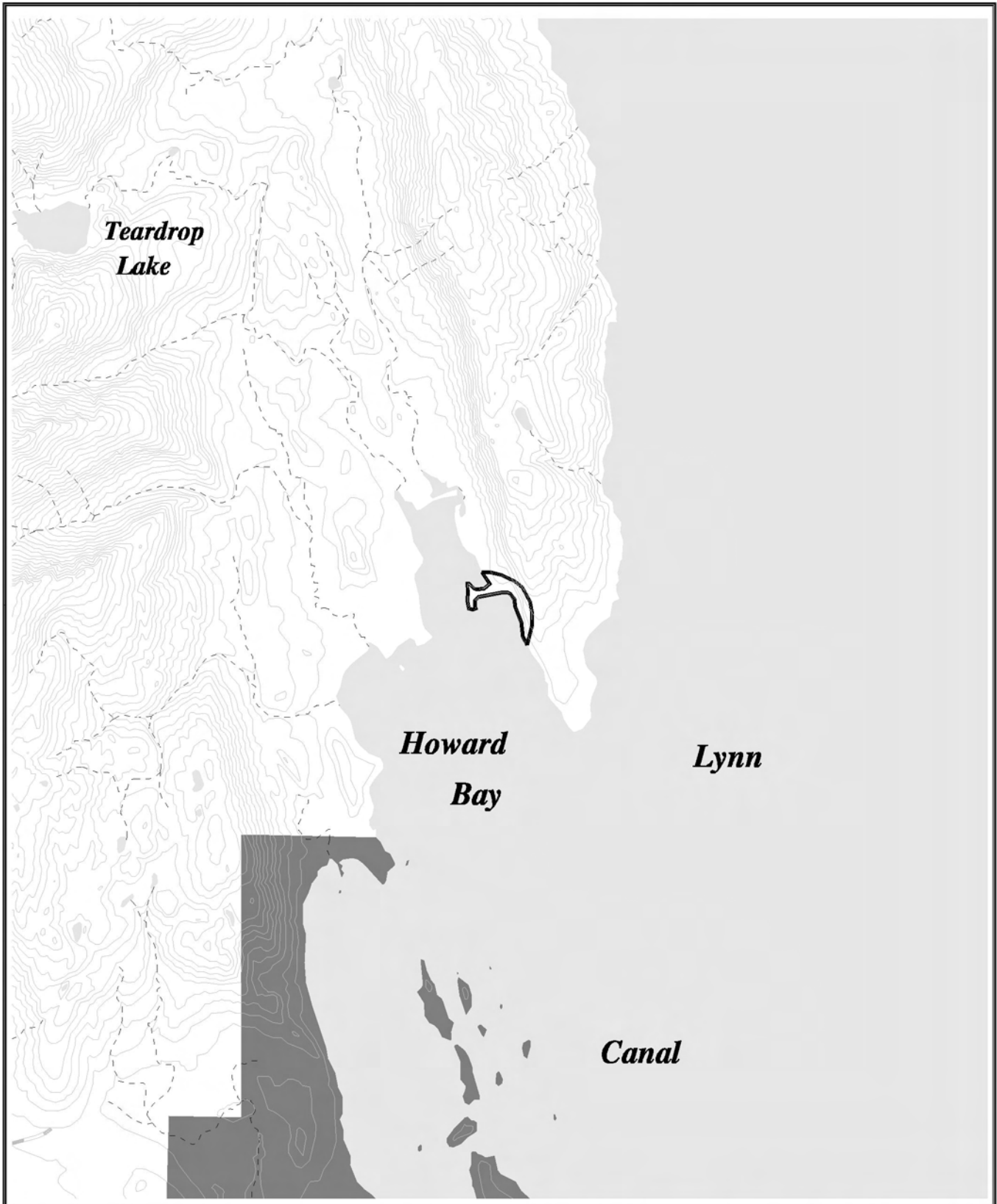
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Howard Bay Alternative 3	
Type	Enclave
Use Area	01-03
LUD	Semi-Remote Recreation
ROS	Semi-Primitive Motorized
Acres	45
General Characteristics	This area has a small “boot-shaped” peninsula that bisects two coves looking out on a shallow, sandy bay. Some rocks occur offshore and can present a hazard to boats and float planes at lower tides. Beyond the tide line a stand of spruce trees extends several hundred yards before opening up into a large meadow and a valley. The northeastern shore has rock bluffs that provide visual interest, but opportunities to walk inside the tree line are limited.
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	Floatplane and boat
Facilities	None
Concerns and/or Opportunities	Groups can disperse away from shoreline and out of sight and sound of one another. This area appears to have outstanding opportunities for wildlife viewing from the tree edge into the meadows without disturbing animals. Wildflowers are in abundance and there are scenic vistas both on and offshore.
Attractions	A large, open bay is protected from the north. It is a relatively short flight from Juneau.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian
Other Management Plans	Northern Southeast Area Plan (DNR), Haines Area, Designation Habitat and Harvest Area

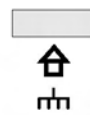
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-03 HOWARD BAY



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



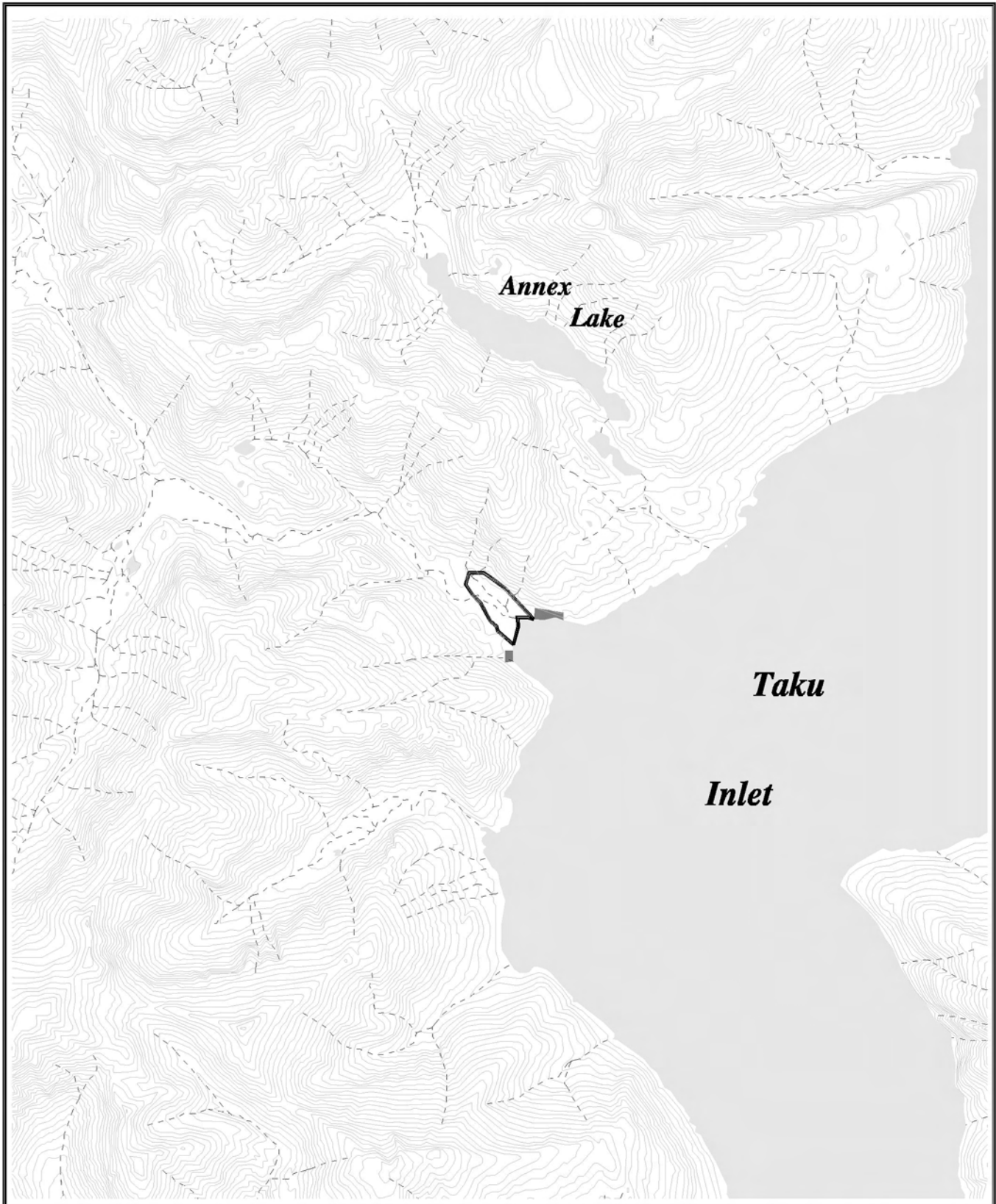
Mapscale 1:63360










Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Sunny Cove Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 01-04C Semi-Remote Recreation Roaded Natural 66
General Characteristics	<p>This site is located on the north side of Taku Inlet on Carlson Creek, which empties into Sunny Cove. Carlson Creek is a wide, shallow, fast moving stream with numerous pools, a rocky bottom, and large boulders. A power line passes the north side of the cove but is not too obtrusive. Relatively flat banks above the creek make for easy walking.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001.</p>
Access	<p>The cove has a muddy tide flat at low tide and is rockier up the beach. The forest on the north side is poor for walking and the private parcel would have to be skirted. The timber is better on the south side and it would be easier to access more of the site. The creek is not fordable except with hip waders.</p>
Facilities	<p>A power line runs through the area.</p>
Concerns and/or Opportunities	<p>This area provides wildlife and wildflower viewing, fishing, hiking, and bird watching opportunities. Access to National Forest lands is along the tide flat. There are two small privately owned parcels in the cove.</p>
Attractions	<p>Carlson Creek is a very large scenic creek. There are excellent views of the mountains across Taku Inlet. This area offers easy walking through bear paths, beach grass, and some rocks.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian • Guided use must not trespass on private land.
Other Management Plans	<p>Juneau State Land Plan (DNR), Region 14, Designation Habitat</p>

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 01-04C SUNNY COVE



- | | | | | | |
|---|---------------------------|---|--------------------------|---|----------------------|
|  | Large Group Area Boundary |  | Non National Forest Land |  | Salt and Fresh Water |
|  | Streams |  | Wilderness |  | Recreation Cabin |
|  | Existing Road |  | Outside of Project Area |  | Marine Access Point |



1 0.5 0 1 2 Miles



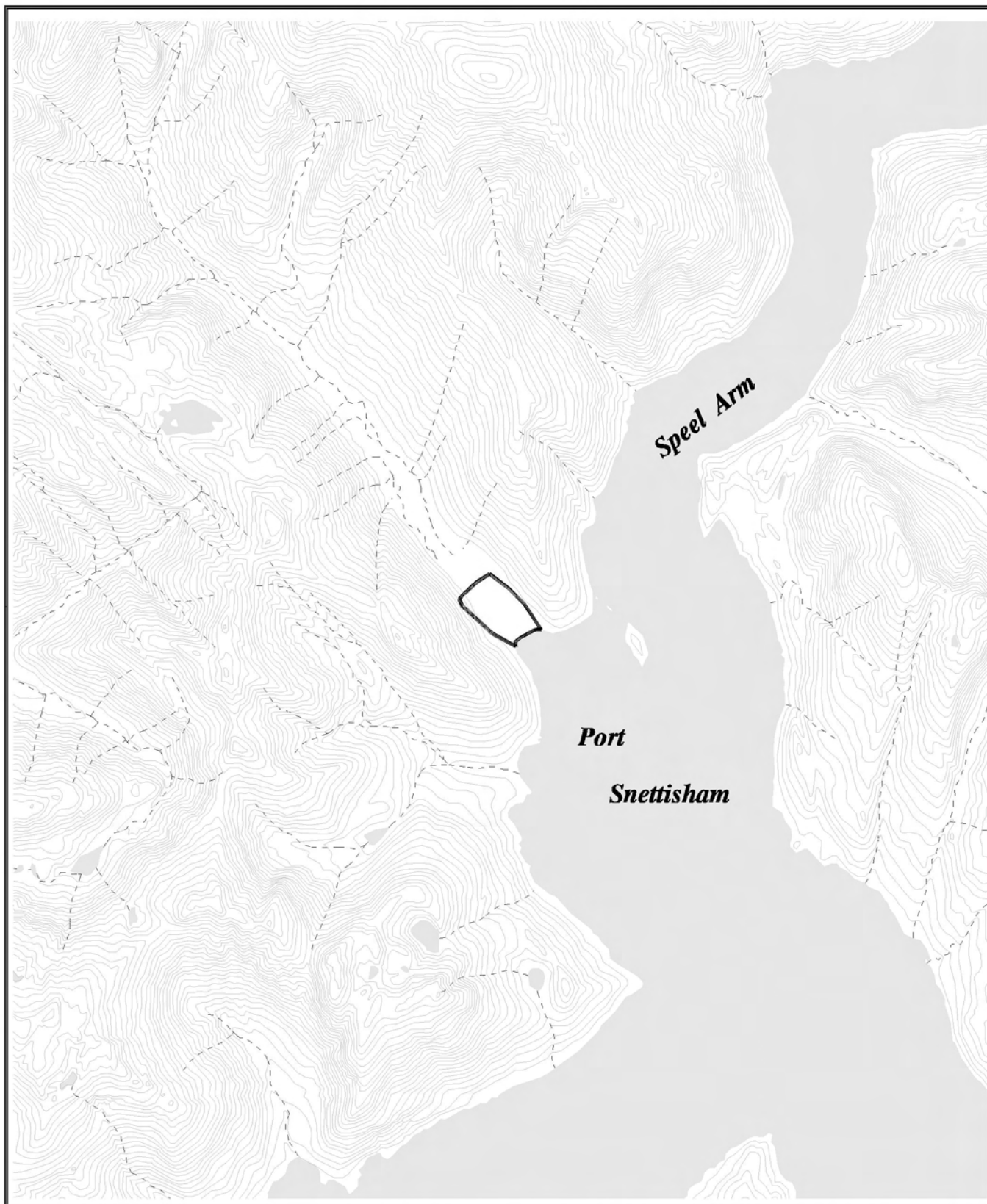
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Mallard Cove Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 01-05B Modified Landscape Roaded Natural/ Semi-Primitive Motorized 96
General Characteristics	This site is a long tidal slough that turns into marshy grassland. Prospect Creek forks in several places in this grassland with beaver ponds approximately one mile inland. The Snettisham power line passes by the opening of Mallard Cove and the related timber harvest is visible with the overhead power lines. There is an excellent view up Prospect Creek into the valley.
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	The area just outside the tree line is probably the best for walking, though there are animal trails that can be followed under the tree canopy. Portions of the tide flat are soft, making walking somewhat difficult. The creek is wide and deep enough to land small boats at a variety of tidal phases.
Facilities	None
Concerns and/or Opportunities	A seal haul-out exists on the rocks northwest and to the south of Fannie Island.
Attractions	This area has an interesting tidal slough and a chance to walk in the large meadow, in addition to wildlife and wildflower viewing opportunities.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Marine mammals ○ Vegetation ○ Riparian ○ Cultural resources
Other Management Plans	Juneau State Land Plan (DNR), Region 15, Designation Habitat and Harvest, Recreation and Tourism (dispersed)

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B MALLARD COVE



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



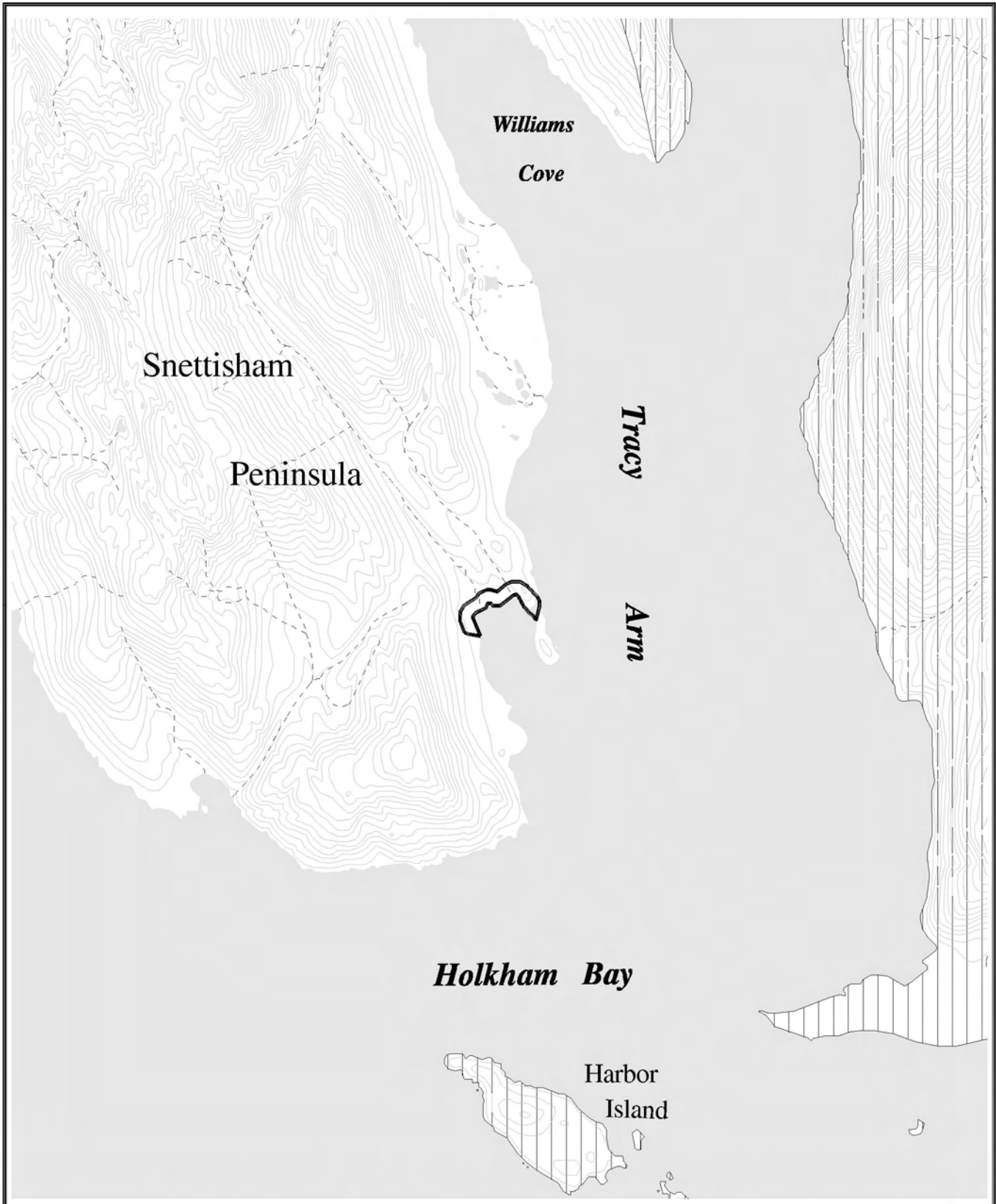
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
No Name Cove Alternatives 3, 4, 5	
Type Use Area ROS LUD Acres	Enclave 01-05B Semi-Primitive Motorized Semi-Remote Recreation 52
General Characteristics	No Name Cove is on the northern side of the entrance to Tracy Arm between Williams Cove and Point Coke. A meadow provides vistas into Tracy Arm fiord. Most of the cove has flat ground and mature trees that provide shelter from the weather and views of the iceberg outflow from the fiord. A large, shallow rocky creek flows into the cove.
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	The best anchorage and beach is in the vicinity of the isthmus. This area is an anchorage for many boats using Tracy Arm. Much of the cove, particularly the central part, has a long, shallow tide flat with rocks and gravel.
Facilities	None
Attractions	This area offers a good anchorage, wildlife and wildflower viewing. Icebergs coming out of Tracy Arm run aground here, providing visitors with a close view. The proximity to Tracy Arm/Fords Terror Wilderness Area allows for a boat trip up the fiord and a shore excursion on the same day.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian ○ Cultural resources • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Juneau State Land Plan (DNR), Region 15, Designation Habitat and Harvest, Recreation and Tourism (dispersed) and Public Facilities-Reserved Sites (sites reserved for infrastructure)

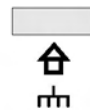
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B NO NAME COVE



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



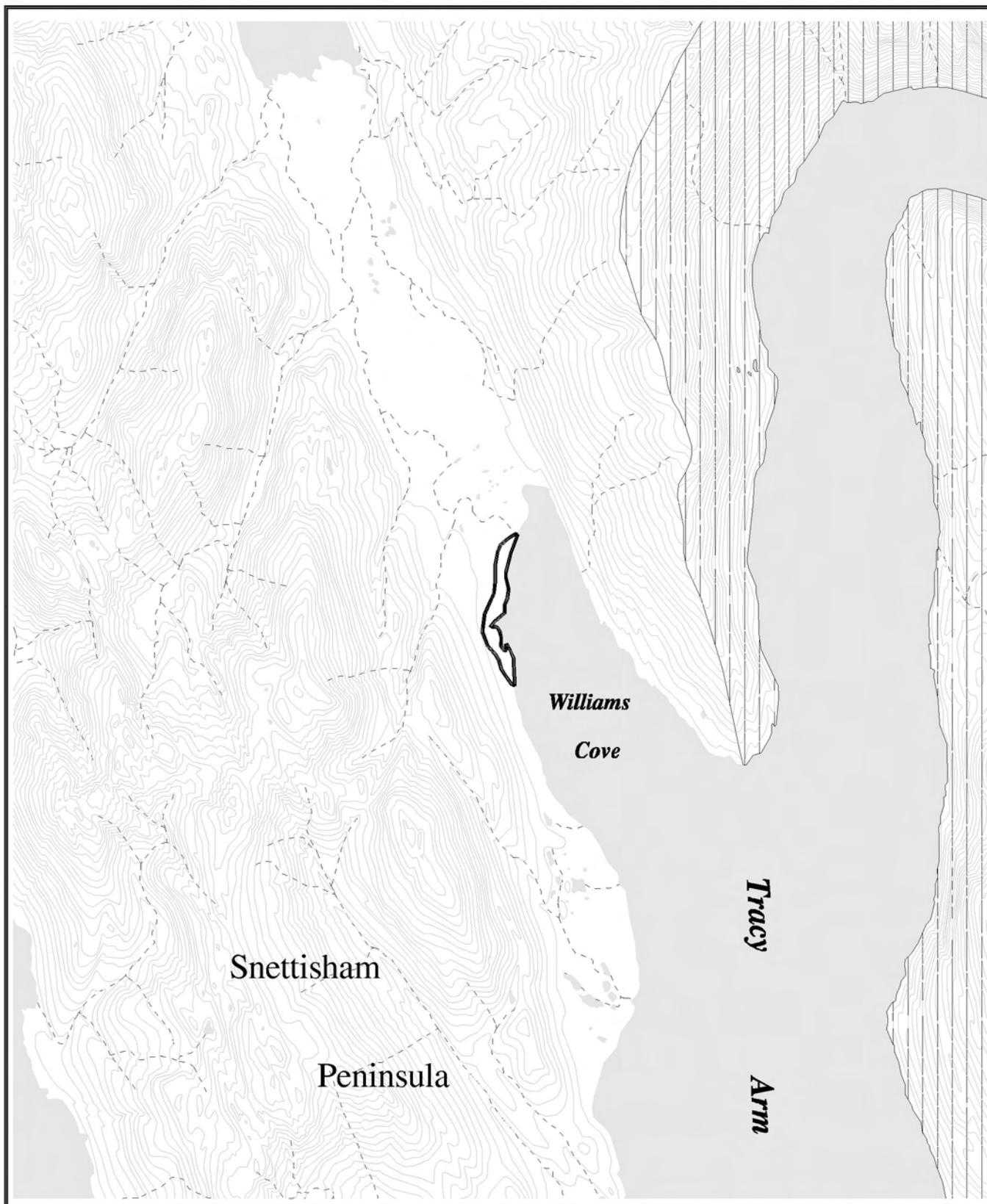
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Williams Cove	
Type	Enclave
Use Area	01-05B
ROS	Semi-Primitive Motorized
LUD	Semi-Remote Recreation
Acres	64
General Characteristics	Williams Cove is on the northern side of the entrance to Tracy Arm between No Name Cove and the Wilderness area boundary. Most of the cove has flat ground, with an upland terrace beyond the tree line along the beach. Mature trees provide shelter from weather and views of the iceberg outflow from the fiord. A large, shallow rocky creek flows into the cove at the north end. A pioneer foot trail enters the woods near another small creek near the southern boundary. Icebergs frequently circulate through the cove, which receives mostly day use from boaters due to ice movement through the cove.
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	The best anchorage and beach is in the vicinity of the isthmus. This area is an anchorage for a few boats using Tracy Arm.
Facilities	None
Attractions	This area offers a fair anchorage, wildlife and wildflower viewing. Icebergs coming out of Tracy Arm run aground here, providing visitors with a close view. Proximity to Tracy Arm/Fords Terror Wilderness Area allows for a boat trip up the fiord and a shore excursion on the same day.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian ○ Cultural resources • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Juneau State Land Plan (DNR), Region 15, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B WILLIAMS COVE



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



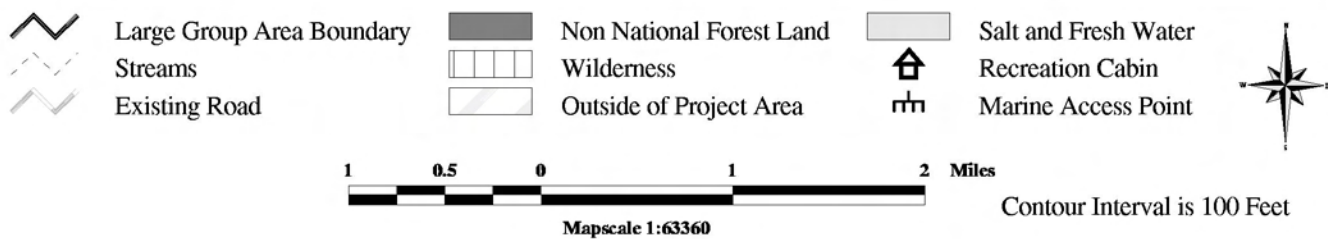
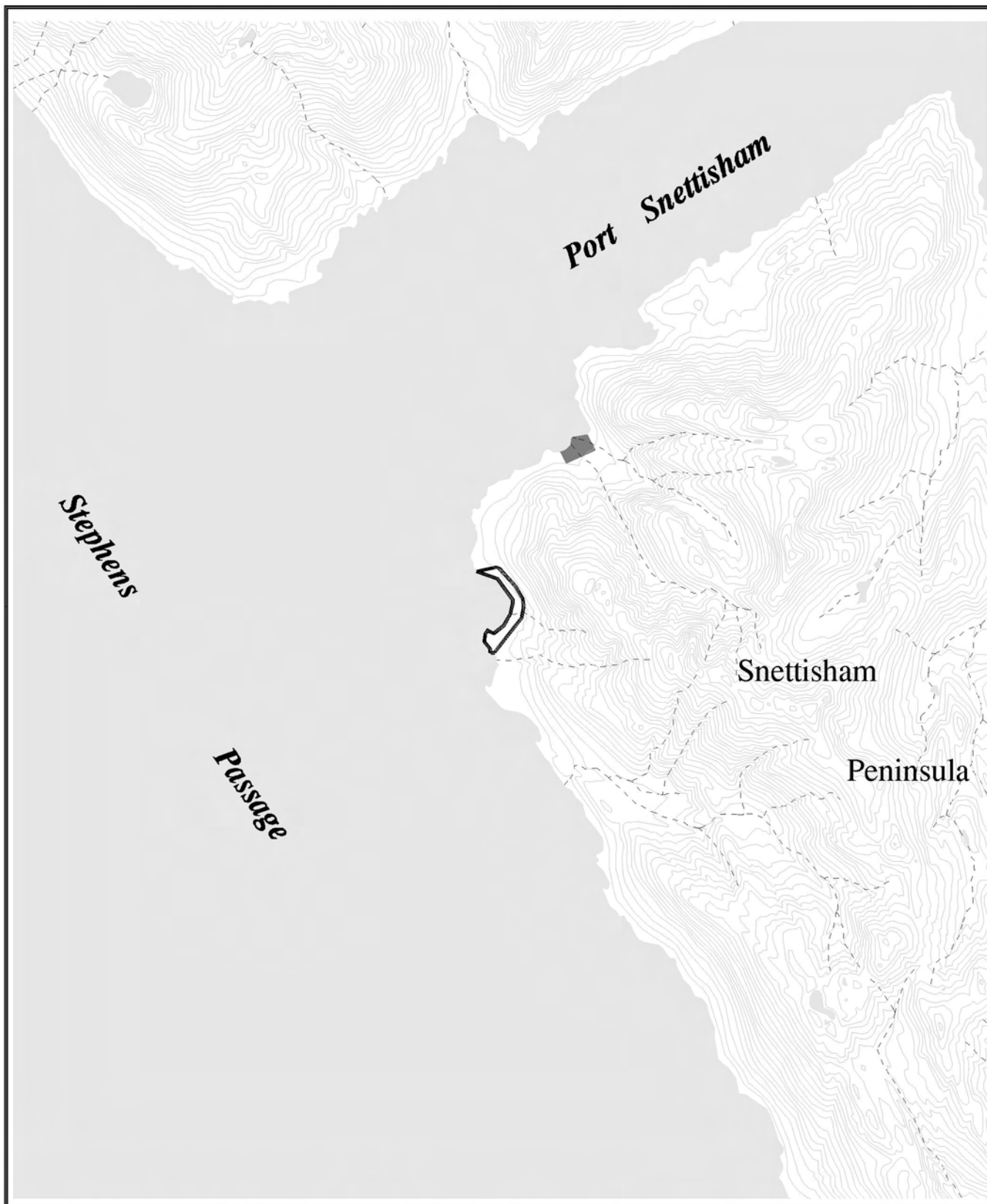
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Point Anmer Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 01-05B Scenic Viewshed Semi-Primitive Motorized 37
General Characteristics	<p>This northwest-facing cove is about ¼ mile wide and about ½ mile north of Point Anmer. Dense shrub patches characterize shoreline in this area with large spruce trees just off the beach fringe. At the outermost edge of the thicket is a forested point of land with large spruce and exposed roots that follow a rocky outcrop towards the beach.</p>
Historical Use	<p>There was no reported commercial use during 1999-2001. The area receives some unguided use.</p>
Access	<p>Low tide exposes a sandy bottom on the south end and a rocky beach at the north end. The southern beach is flatter but has thick vegetation. A small, steeper sand beach just to the south of the rock outcrop provides good access, although this beach is more exposed to the southeast winds. The beach receives high storm waves.</p>
Facilities	<p>None</p>
Attractions	<p>The upper beach area provides wildflower viewing and vistas of the ocean. Opportunity to view vegetation successional stages from shrubs to old growth spruce forest. Rock outcroppings also provide visual diversity. Tide pools support many shorebirds. A large waterfall is visible offshore south of Point Anmer.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation
Other Management Plans	<p>Juneau State Land Plan (DNR), Region 15, Designation Habitat and Harvest, Recreation and Tourism (dispersed)</p>

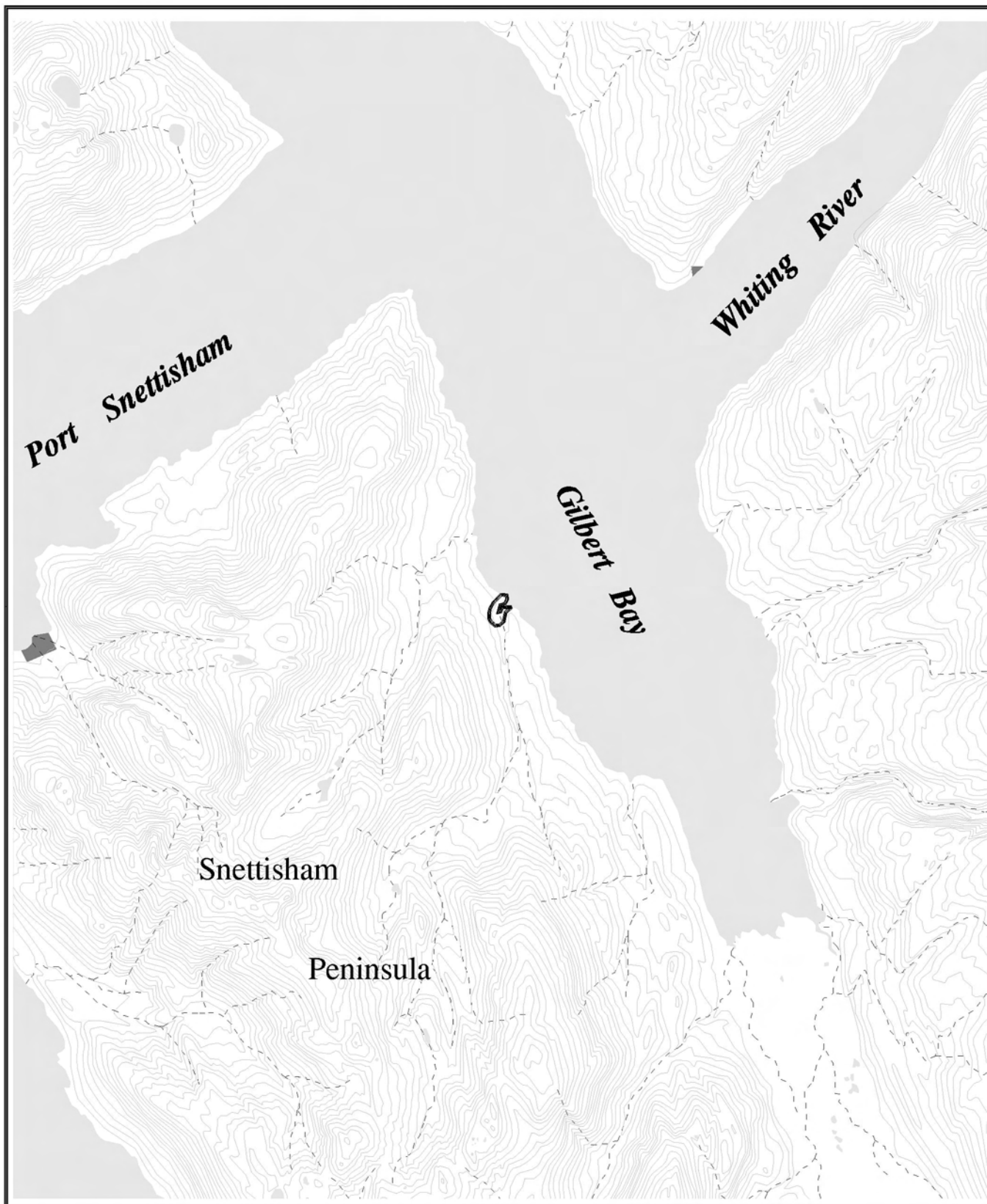
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B POINT ANMER



Appendix B—Large Group Areas

Large Group Area	
West Gilbert Bay Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 01-05B Timber Production Semi-Primitive Motorized 12
General Characteristics	Located directly across from the Whiting River in Gilbert Bay. The creek has river cobble and small pools, and is fordable at many locations. It is possible to follow the creek along its bank during low water conditions, providing a view of a forested stream for an extended distance. On the northern side of the creek there are large trees with an open understory and relatively flat ground.
Historical Use	Commercial groups used this general area in 1999-2001.
Access	The relatively shallow beach has large cobble rocks.
Facilities	None
Concerns and/or Opportunities	The site is adjacent to a salmon stream.
Attractions	Wildlife viewing, walking through the forest or along the creek side channels during low flows
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian
Other Management Plans	Juneau State Land Plan (DNR), Region 15, Designation Habitat and Harvest, Recreation and Tourism (dispersed)

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B WEST GILBERT BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



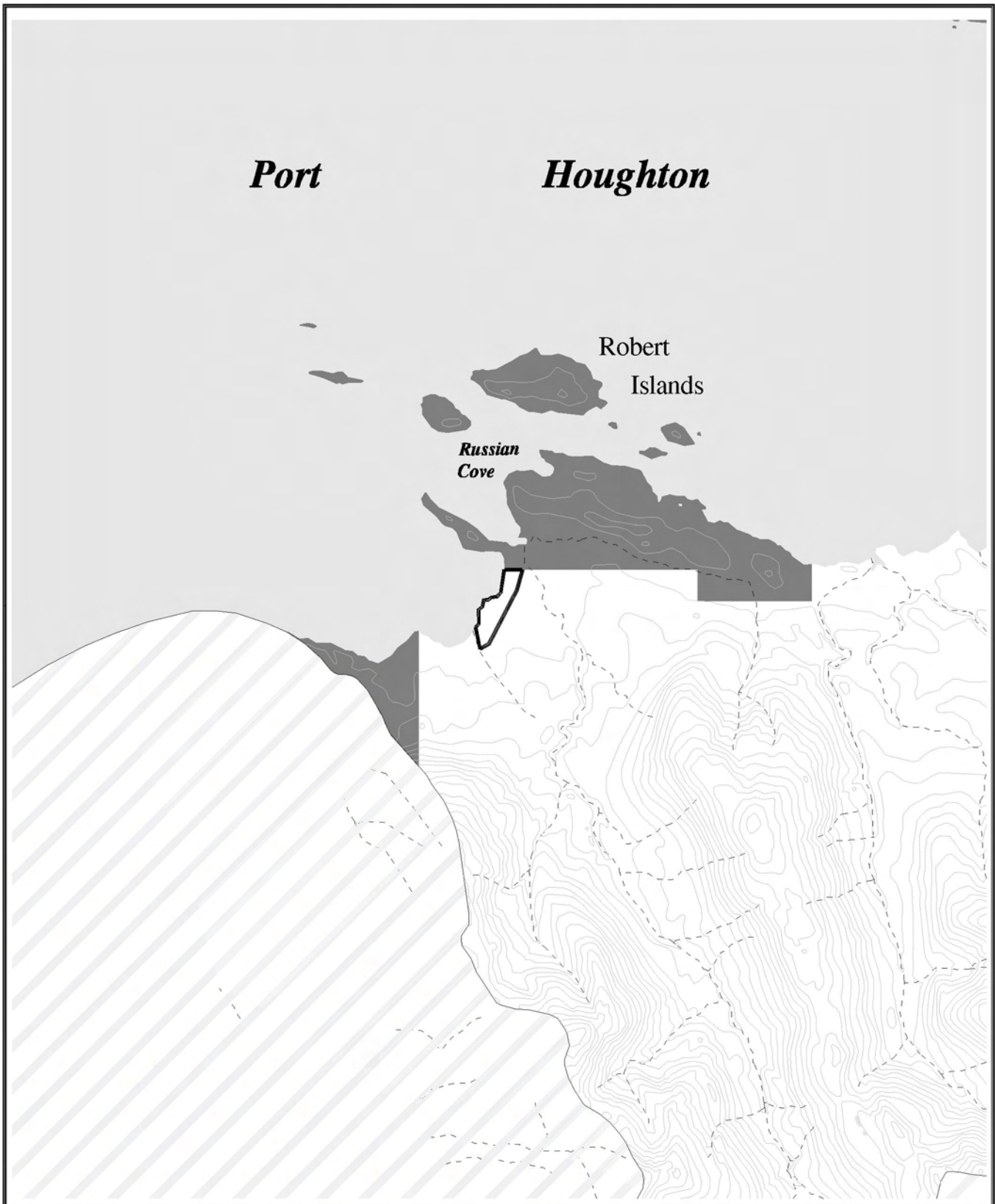
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Fanshaw Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 01-05C Scenic Viewshed Semi-Primitive Motorized 48
General Characteristics	<p>This cove is over a mile wide. A tree-covered peninsula allows for views to the north with another smaller cove providing wildlife viewing opportunities. Topography in the area is flat to benched, with gently rolling terrain. Primarily a forested area with open understory, there are occasional patches of dense trees, brush and small meadows. The southeast corner of the cove has a small creek with flatter ground and good visibility.</p>
Historical Use	<p>There was no reported commercial recreation use of this site during 1999-2001. There has been some timber harvest. Remnants of an old dock and pilings are adjacent to the area.</p>
Access	<p>Shoreline on the south side of the cove is rocky and very slippery. To the north, the shoreline is sandy at low tide, but more difficulty to access by boat or plane.</p>
Facilities	<p>None</p>
Concerns and/or Opportunities	<p>Opportunities for wildlife viewing, fishing, and beach walking exist. There is high plant diversity with beach rye grass, wildflowers, and forest. State lands are adjacent.</p>
Attractions	<p>The beach walking with ample opportunities to walk in the woods along the tree line. Evidence of historic beach logging is found throughout the cove but is most prevalent in the center. From the peninsula, it is possible to get elevated views of the adjoining small cove. A salmon stream abuts the north side of the peninsula, where it is possible to get good views of the tide flat, Point Walpole, and Crow Island.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Vegetation ○ Riparian ○ Cultural resources • Guided use on state land must be authorized by the state.
Other Management Plans	<p>Central/Southern Southeast Plan (DNR), Region 15, Designation General Use</p>

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 01-05C FANSHAW



Large Group Area Boundary
Streams
Existing Road

Non National Forest Land
Wilderness
Outside of Project Area

Salt and Fresh Water
Recreation Cabin
Marine Access Point



1 0.5 0 1 2 Miles



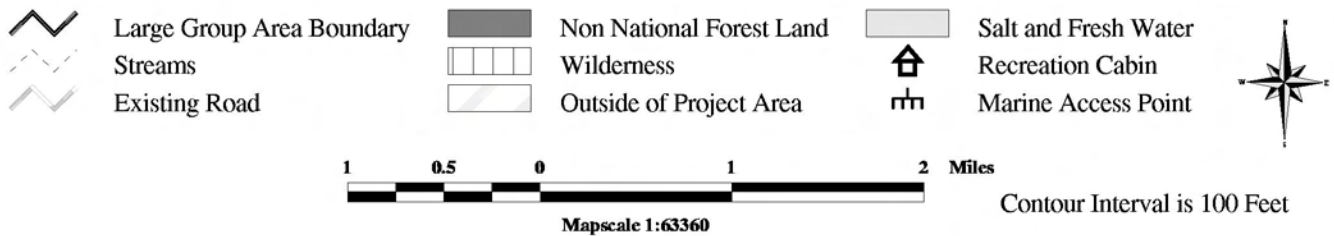
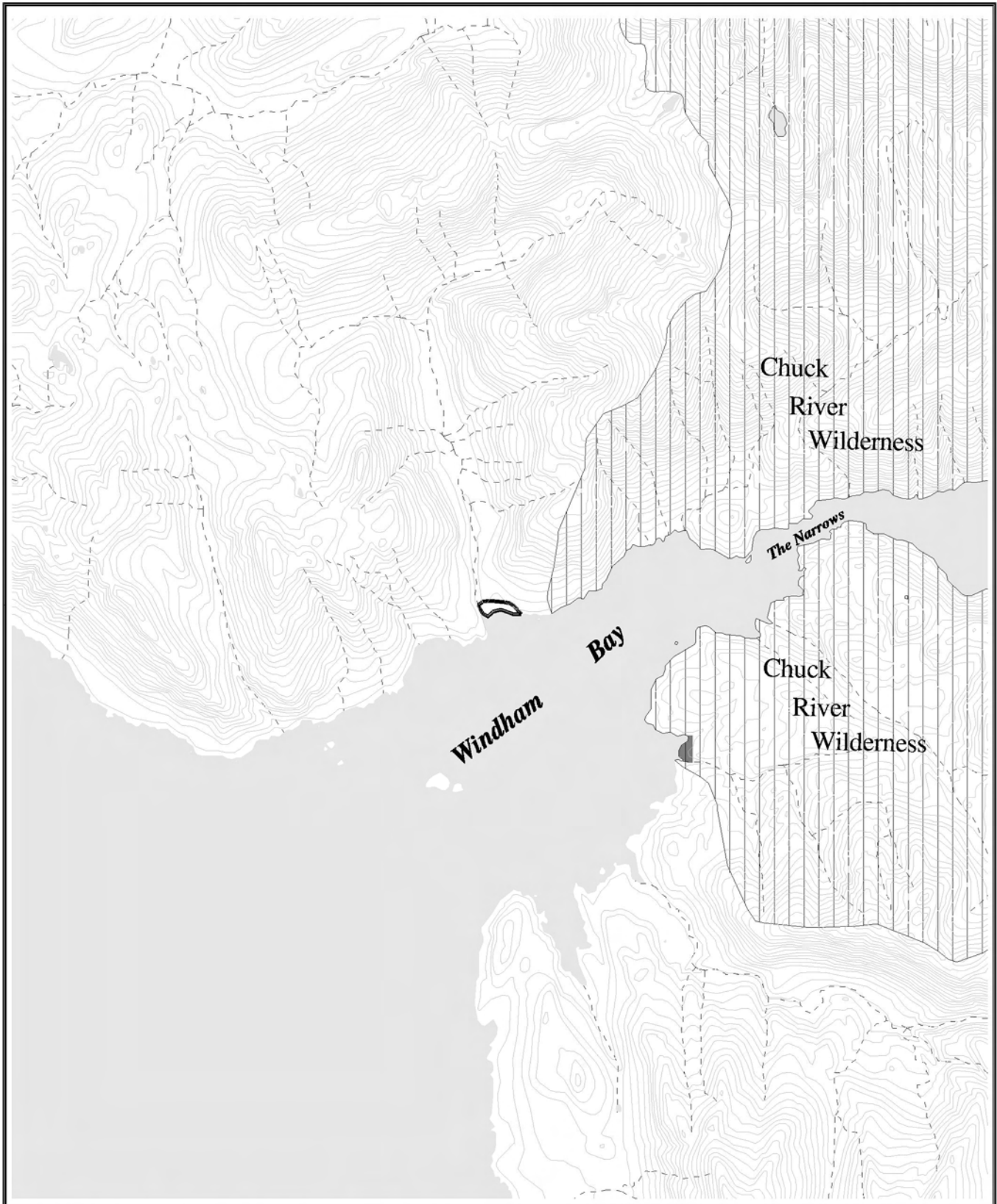
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
North Windham Bay Alternatives 3, 5	
Type	Enclave
Use Area	01-05C
LUD	Scenic Viewshed
ROS	Semi-Primitive Motorized
Acres	12
General Characteristics	Located on the east side of Stephens Passage and directly east of the entrance Seymour Canal. A large salmon-bearing creek flows into the site from the north. The beach is sandy and grassy with a berry thicket and wildflowers above tide line. Beyond the tide line a flat valley contains young trees and man-made openings. This site is within ½ mile of the Chuck River Wilderness boundary.
Historical Use	Commercial outfitter/guides used Windham Bay area during 1999-2001.
Access	Access by plane or boat is possible, though this would probably not be a good location for an anchorage due to exposure.
Facilities	None
Concerns and/or Opportunities	The west side of the area has a fox farm cabin and related remains. This site has an Eligible determination for the National Register of Historic Places. It offers interpretive opportunities. There are other cultural sites in the area as well. There are some places where wet soils would not stand up well to heavy foot traffic.
Attractions	This is an excellent south facing location with a good beach. The creek may provide salmon viewing and fishing opportunities, coupled with views across the bay and rock grottos on the east side of the site. Wildlife viewing, beach combing, and limited hiking are possible here. A bear trail was noted from the beach into the woods.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation ○ Cultural resources • The fox farm site will have a management plan covering protection, interpretation, and monitoring in place before guided use is permitted at the site. • Other cultural sites are excluded from guided use.
Other Management Plans	Central/Southern Southeast Area Plan (DNR), Region 1—Sumdum North, Designation Habitat and Harvest

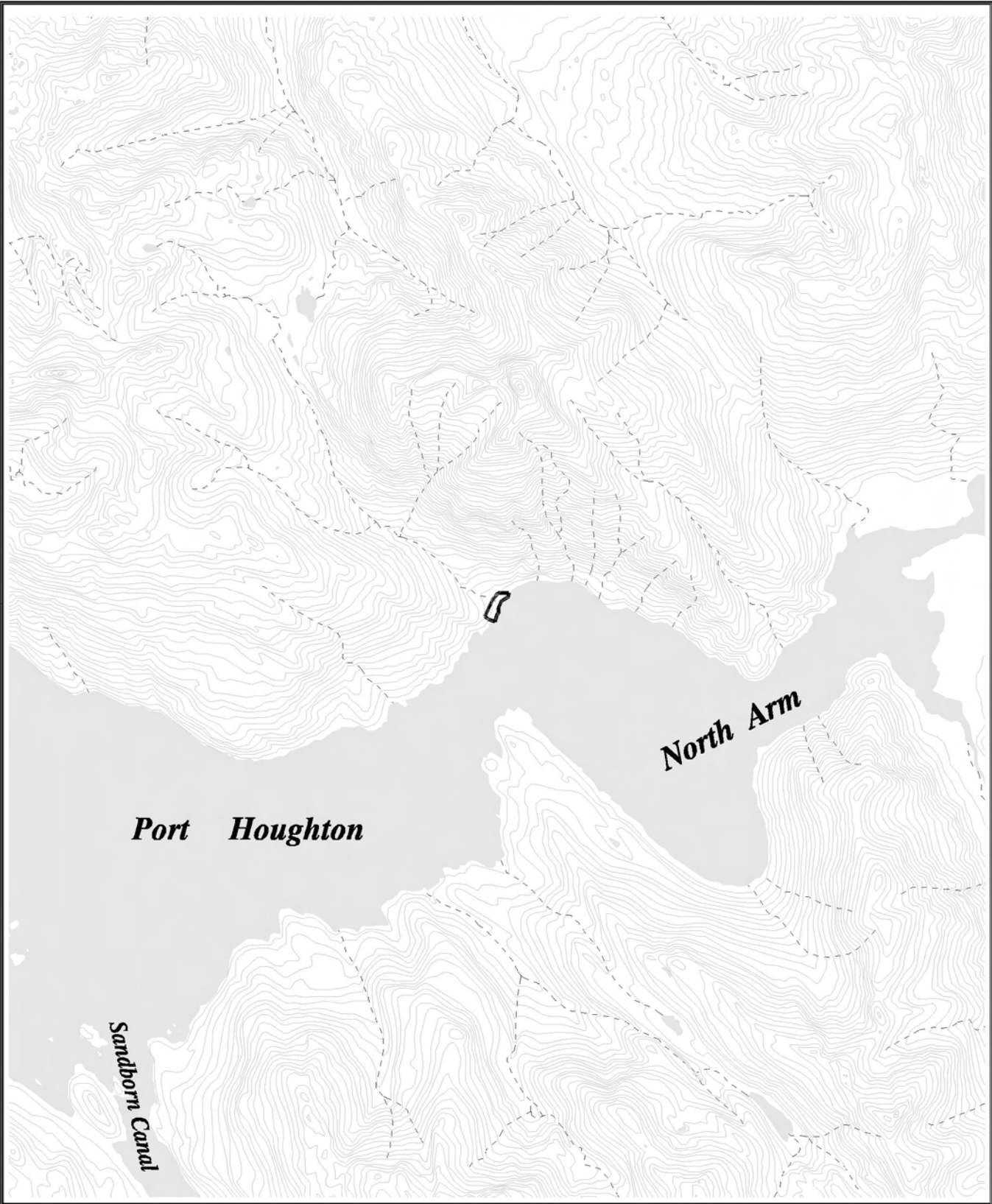
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05C NORTH WINDHAM BAY



Appendix B—Large Group Areas

Large Group Area	
Port Houghton Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 01-05C Scenic Viewshed Semi-Primitive Motorized 10
General Characteristics	<p>This site is located on the north side of Port Houghton. This is a small, distinct location due to the steep terrain surrounding the area. A large creek is present and there are small openings inside the tree line on both sides of the creek. The area contains an old slide that has been colonized by alder and open canopy, creating an attractive light understory.</p>
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	A steep rocky beach provides access to the site. Access along both sides of the creek beyond initial entry into the woods is difficult due to thick brush and downed trees.
Facilities	None
Attractions	This area has a scenic a stream with plunge pools. The site offers nice views across Port Houghton as well as a large waterfall dropping over a cliff just to the east of the creek.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Riparian ○ Vegetation
Other Management Plans	Central/Southern Southeast Area Plan (DNR), Region 1—Sumdum South, Designation General Use

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 01-05C PORT HOUGHTON



Large Group Area Boundary
Streams
Existing Road



Non National Forest Land
Wilderness
Outside of Project Area



Salt and Fresh Water
Recreation Cabin
Marine Access Point



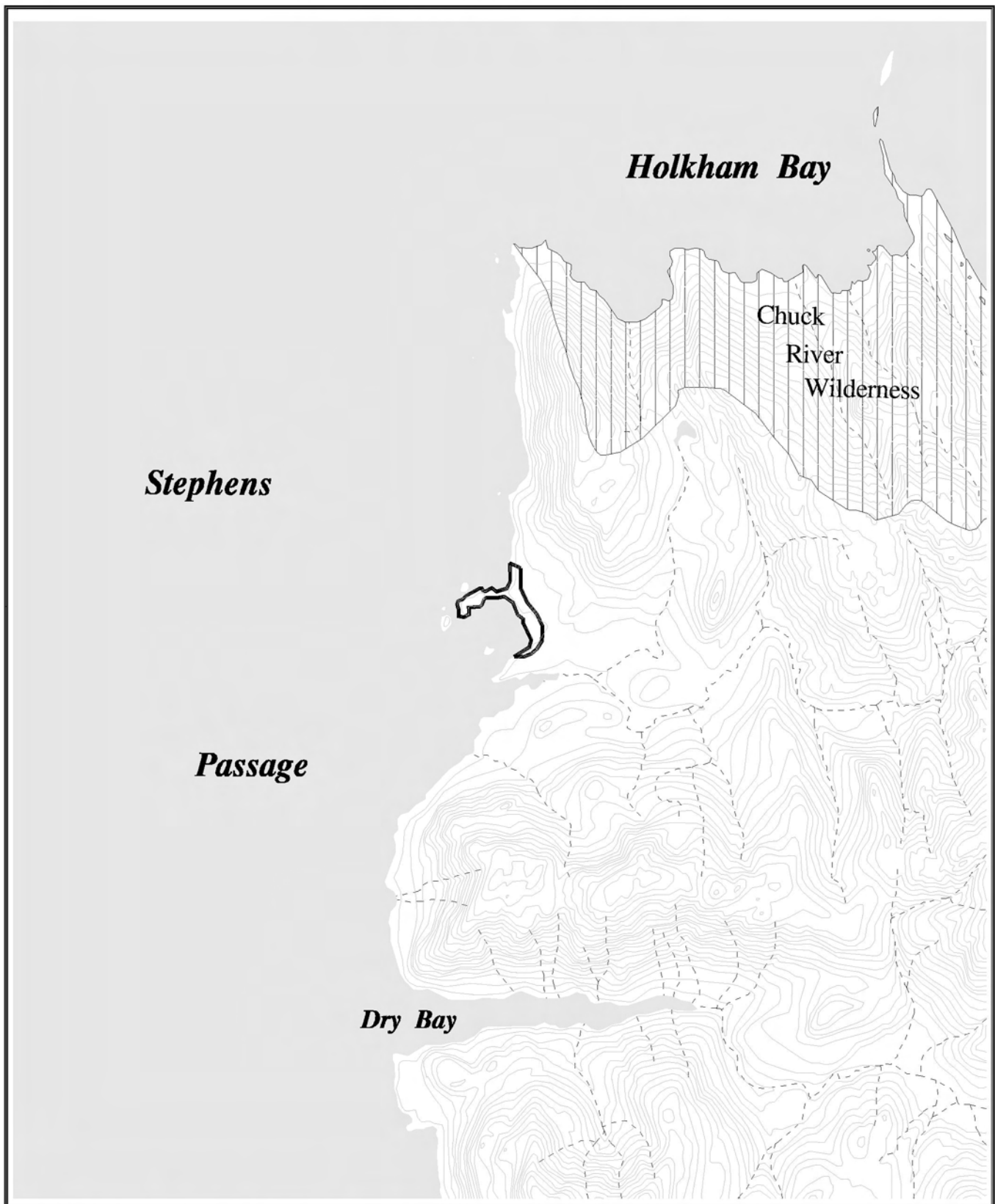
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Sand Bay Alternative 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 01-05C Scenic Viewshed Semi-Primitive Motorized 59
General Characteristics	<p>This site is located in a “u-shaped” cove with the enclave located on the north peninsula extending south down the cove approximately ¼ mile. A fine sand beach and a relatively flat area above the river mouth provide easy walking along the shoreline. It is possible to cross the peninsula and view the adjacent cove to the north. There are large mature trees inland, and visibility under the tree canopy is good.</p>
Historical Use	Commercial outfitter/guides used this area in 1999 - 2001.
Access	There is a rolling sandy beach with some cobble. The area is exposed to weather from Stephens Passage and Frederick Sound.
Facilities	None
Concerns	There are three cultural sites in the area.
Attractions	<p>There is a good view across Stephens Passage. The area is relatively close to the Tracy Arm – Fords Terror Wilderness allowing for a day trip in the fiord and a shore excursion outside the wilderness. In good weather the scenic setting and varied shoreline would provide a suitable location for kayaking.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation ○ Waterfowl (No large group use 7/1 through 9/15 for protection of molting birds) • No large group camping. • No consumptive uses by large groups. • Cultural sites will be excluded from guided use. These sites will be monitored. If impacts are detected, additional restrictions will be placed on guided use.
Other Management Plans	Central/Southern Southeast Area Plan (DNR), Region 1—Sumdum South, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05C SAND BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



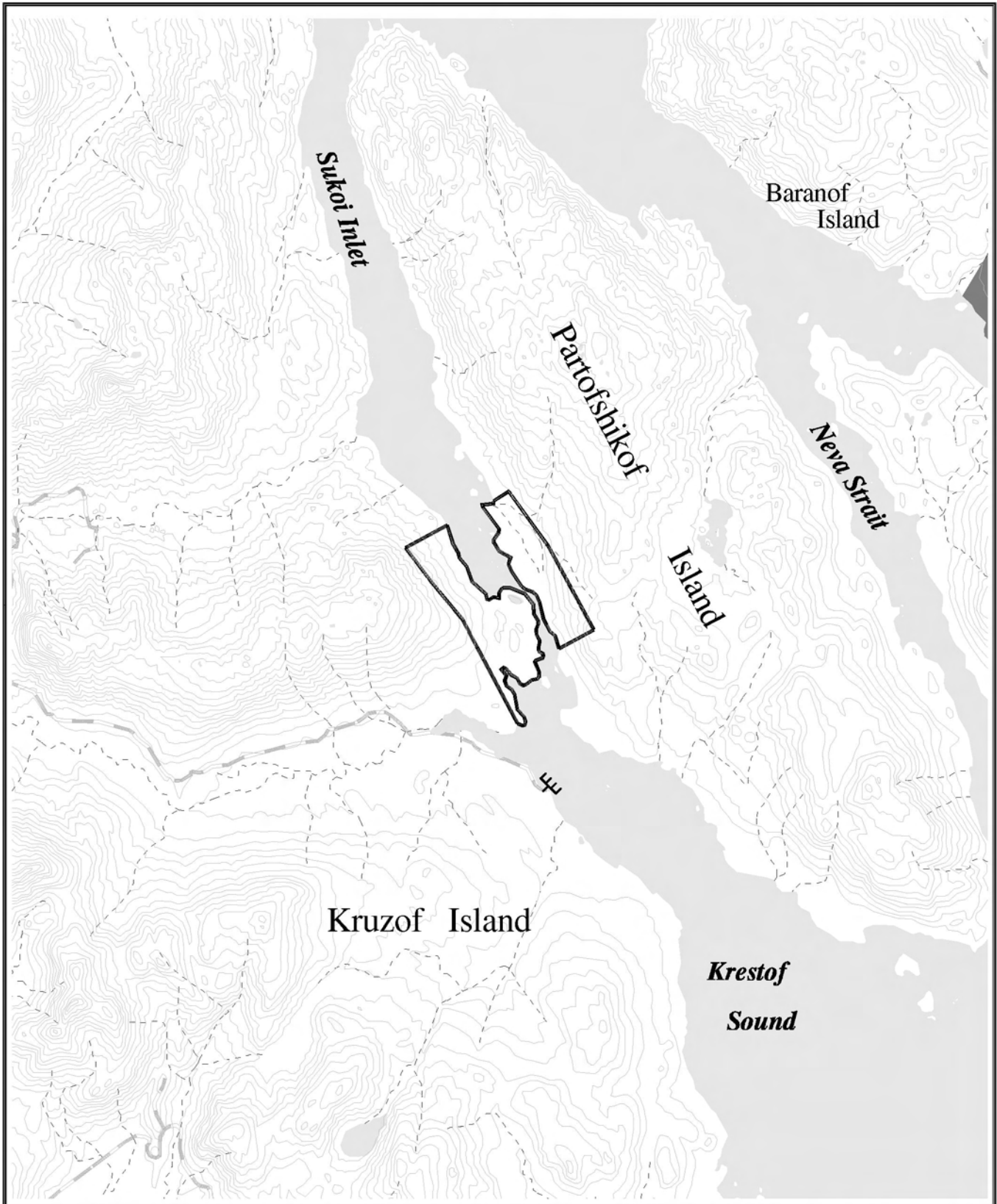
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Dry Pass Alternative 3	
Type Use Area LUD ROS Acres	Enclave 04-03 Semi-Remote Recreation Semi-Primitive Motorized 476
General Characteristics	Most of the surrounding area is forested. There is a small meadow at end of inlet with actual passage at high tide through to the south. It is possible to walk inland for short distance at the end of the inlet but not along the passage because of steep cliffs.
Historical Use	Outfitter/guides used the area in 1999 - 2001.
Access	There is a protected anchorage. Skiff landings are dependent on the tide stage.
Facilities	None
Attractions	Forest and narrow passage between islands
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation • Guided activities will not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-03 DRY PASS



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

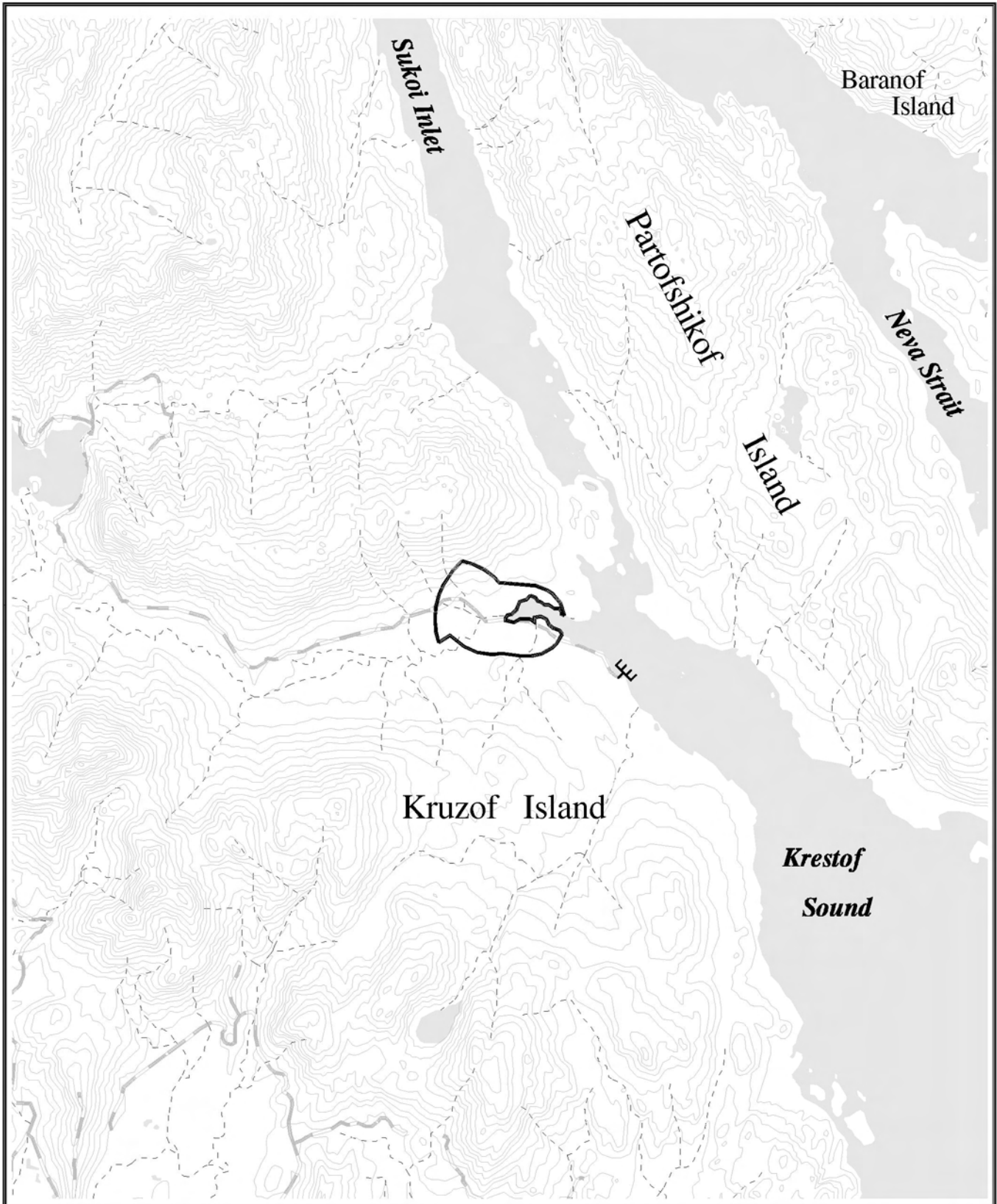
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Eagle River Road Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-03 Semi-Remote Recreation, Timber Production Roaded Modified, Semi-primitive Motorized 251
General Characteristics	The area is roaded through old growth forest with recent timber harvest in the vicinity. Along the road are a large meadow, muskeg, and a stream.
Historical Use	Commercial outfitting/guiding occurred here in 1999 - 2001.
Access	The anchorage is protected during most weather conditions. There is an easy landing at the marine access point or along the beach depending on the tidal stage.
Facilities	There is a road and a marine access point.
Attractions	Opportunity to view wildlife and fish. A large riparian area and estuary offers excellent bird and waterfowl watching opportunities.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation ○ Brown bear viewing • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-03 EAGLE RIVER ROAD



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



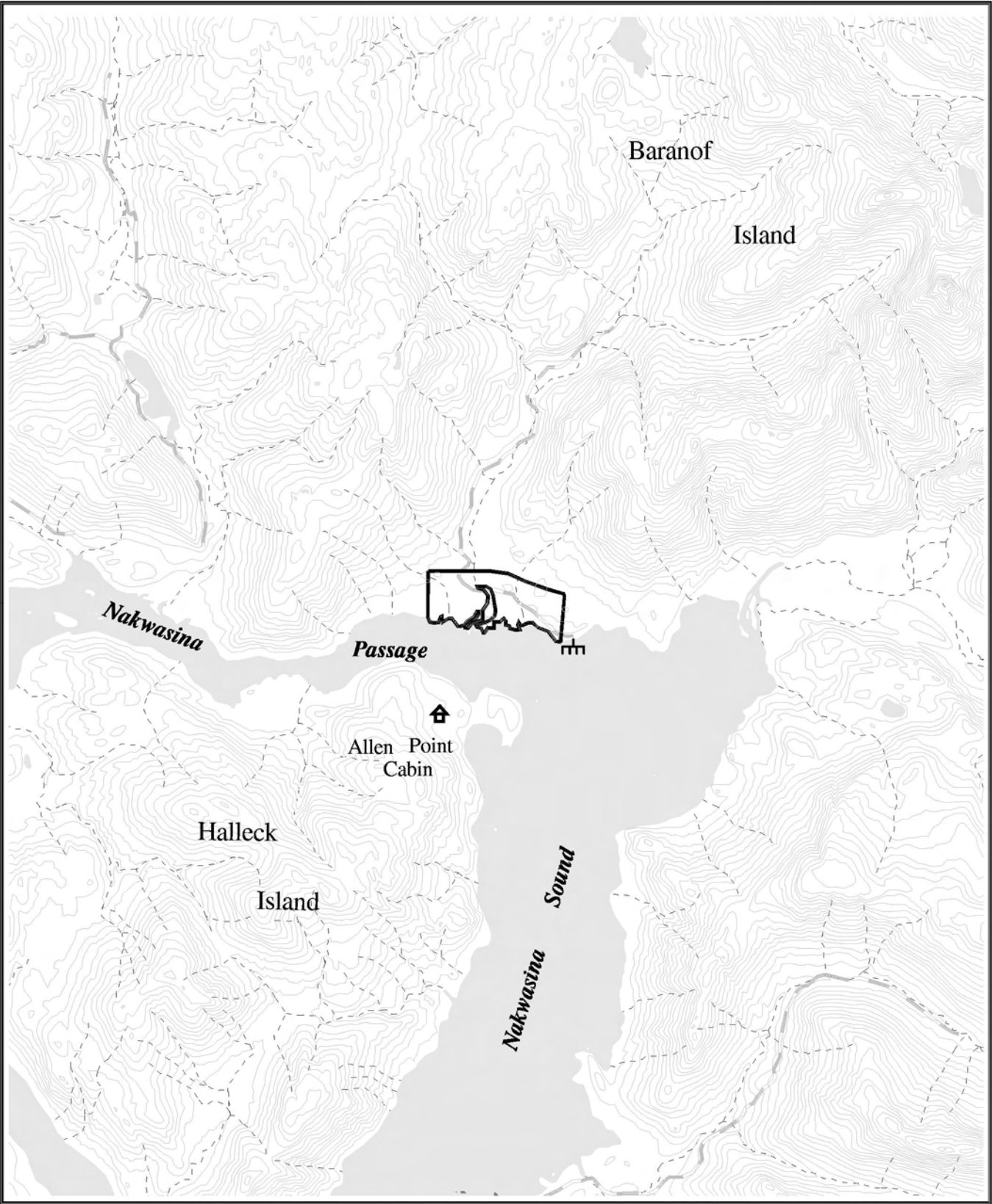
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Noxon Alternative 3	
Type Use Area LUD ROS Acres	Enclave 04-03 Semi-Remote Recreation, Scenic Viewshed Roaded Modified 203
General Characteristics	The valley was logged in the 1960's and thinned in the 1990's. A large tide flat exists at the mouth of Noxon Creek.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	There is a protected anchorage with access to beach at most tidal stages.
Facilities	Road, marine access point
Attractions	Opportunity to view wildlife and hike along the road or shoreline. Opportunities to interpret forest management practices.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Riparian ○ Vegetation ○ Brown bear viewing • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 04-03 NOXON



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



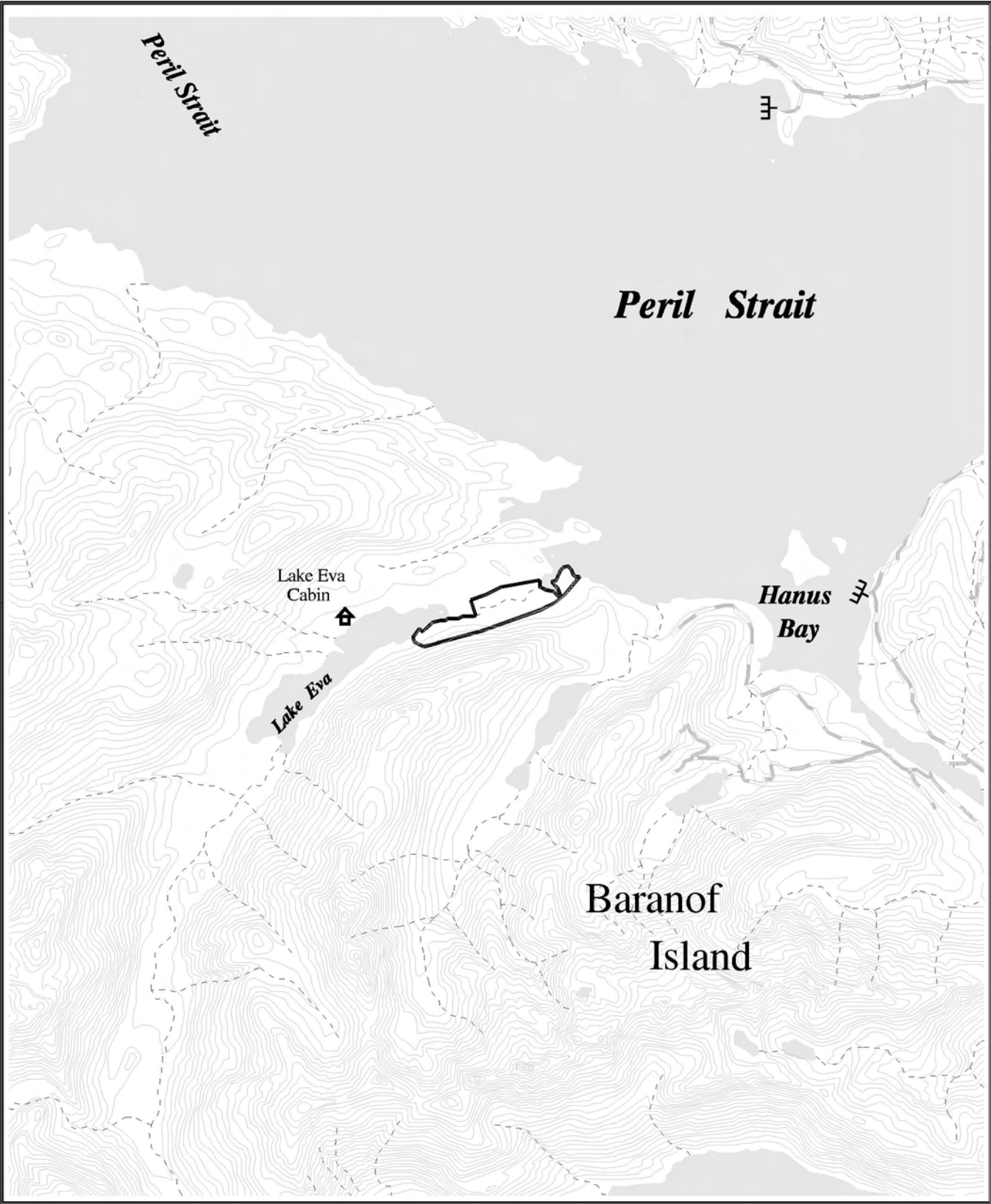
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Lake Eva Trail Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 04-04A Semi-Remote Recreation Semi-Primitive Motorized 132
General Characteristics	<p>This area is a good example of streamside old growth forest. Some very large trees make it an area of particular interest. The trail to Lake Eva is a good for accessing the interior forest as well as the shoreline. Salmon are visible during the mid- and late summer moving up the stream and over the waterfalls. Brown bears feeding on salmon frequent the area. Forest and water birds are usually seen and heard in the spring. Many flowers grow in the meadow and beach fringe vegetation in the early summer.</p>
Historical Use	Commercial outfitter/guides used this area during 1999-2001.
Access	<p>The anchorage is protected from most directions except easterlies. A skiff can land at the trailhead on small sandy beach, and can get to shore in most tide stages. At high tide skiffs can land a short distance below the falls at the estuary.</p>
Facilities	Trail to Lake Eva
Concerns and/or Opportunities	<p>The trail is in poor shape and very muddy in places. A grove of large trees is easily accessed by the trail. There is an important subsistence sockeye stream.</p>
Attractions	A trail leads inland along a salmon stream and through some old growth forest with large trees.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Brown bear viewing ○ Riparian ○ Vegetation ○ Subsistence • Lake Eva trail will need improvement before additional guided use is permitted. • Outfitter/guides will not be allowed to fly clients into Lake Eva.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation Undeveloped Public Recreation and Tourism, Habitat

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 04-04A LAKE EVA TRAIL



Large Group Area Boundary
Streams
Existing Road



Non National Forest Land
Wilderness
Outside of Project Area



Salt and Fresh Water
Recreation Cabin
Marine Access Point



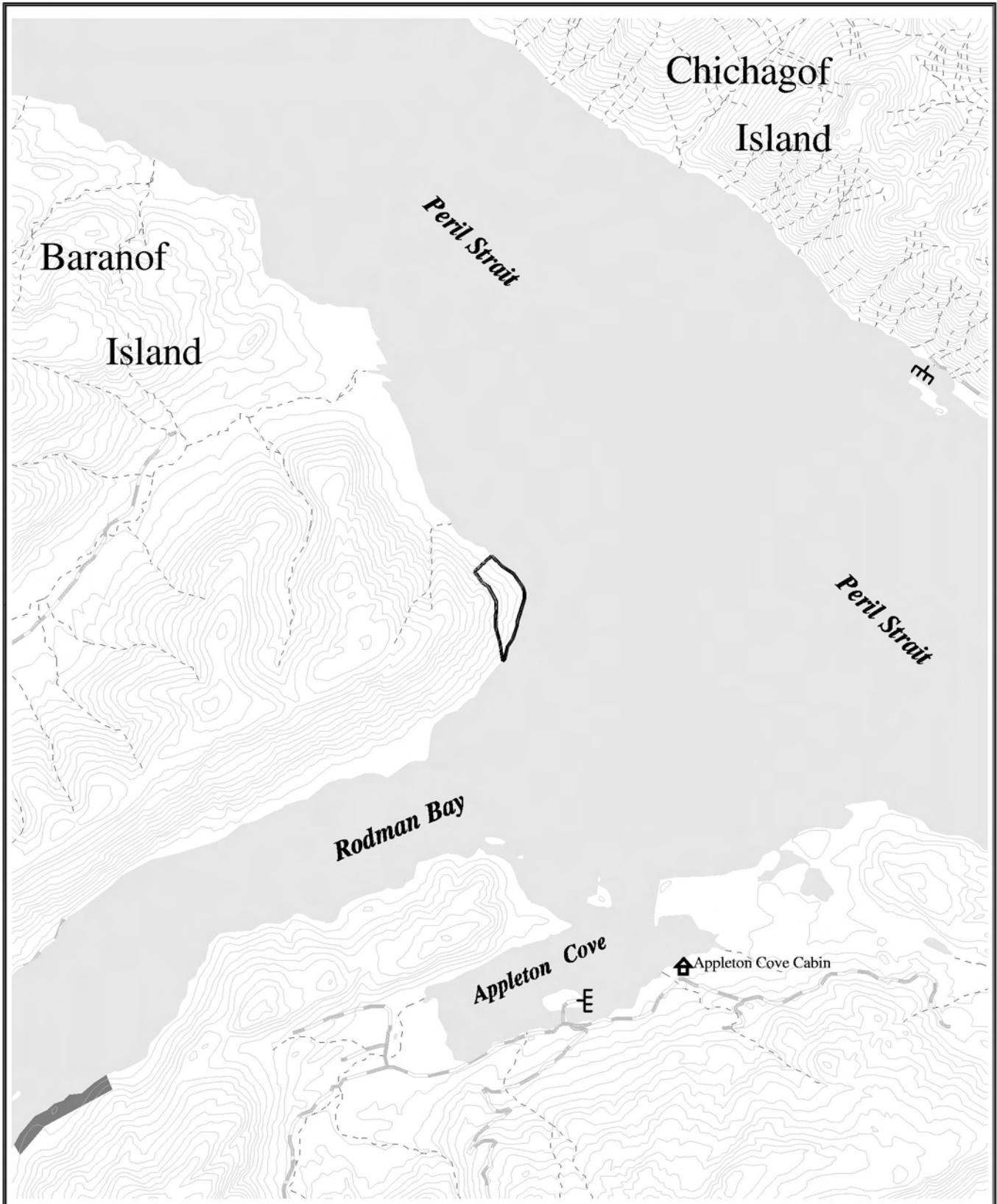
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

<p>Large Group Area</p> <p>Point Elizabeth</p> <p>Alternatives 3, 5</p>	
Type Use Area LUD ROS Acres	<p>Enclave</p> <p>04-04A</p> <p>Timber Production</p> <p>Roaded Modified</p> <p>72</p>
General Characteristics	<p>The immediate area is forested. A small bight of land to the west provides some protection for anchoring. Timber harvest is evident in the vicinity. Walking along the forest edge and inside the beach fringe is possible along wildlife trails. Beach fringes have large Sitka Spruce and small root mass ponds with interesting vegetation and successional stages. Intertidal life along the pebble shoreline can be viewed at low tide.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001.</p>
Access	<p>The anchorage is exposed on Peril Straits but is suitable in good weather. Skiffs can land along the pebble beach; the exact location depends on the tide stage.</p>
Facilities	<p>None</p>
Attractions	<p>A nice small beach can be walked at low tide. There is a large beach fringe forest.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian ○ Brown bear viewing
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Baranof Island Area, Designation General Use</p>

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04A POINT ELIZABETH



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



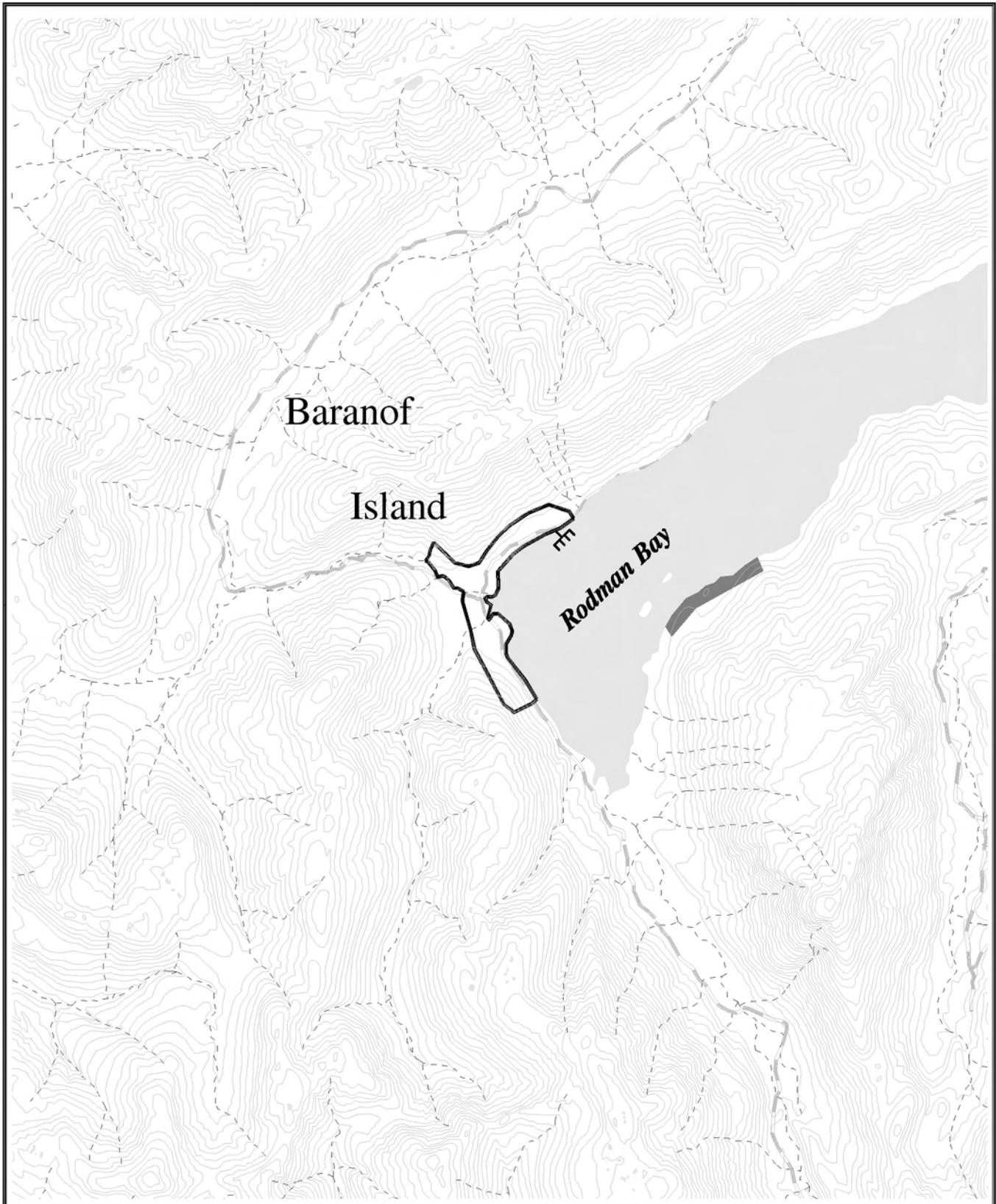
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Rodman Bay Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 04-04A Timber Production Roaded Modified 252
General Characteristics	The area was harvested in the 1960's. The harvested areas are regenerating with spruce and hemlock and the road is overgrown with alder.
Historical Use	Logging took place in the 1960's. Commercial outfitter/guides used this area 1999-2001.
Access	The anchorage is protected during most weather conditions. Skiffs can land on the beach at most tidal stages.
Facilities	Road, marine access point
Attractions	Wildlife viewing, hiking on the beach and road
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Riparian • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04A RODMAN BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



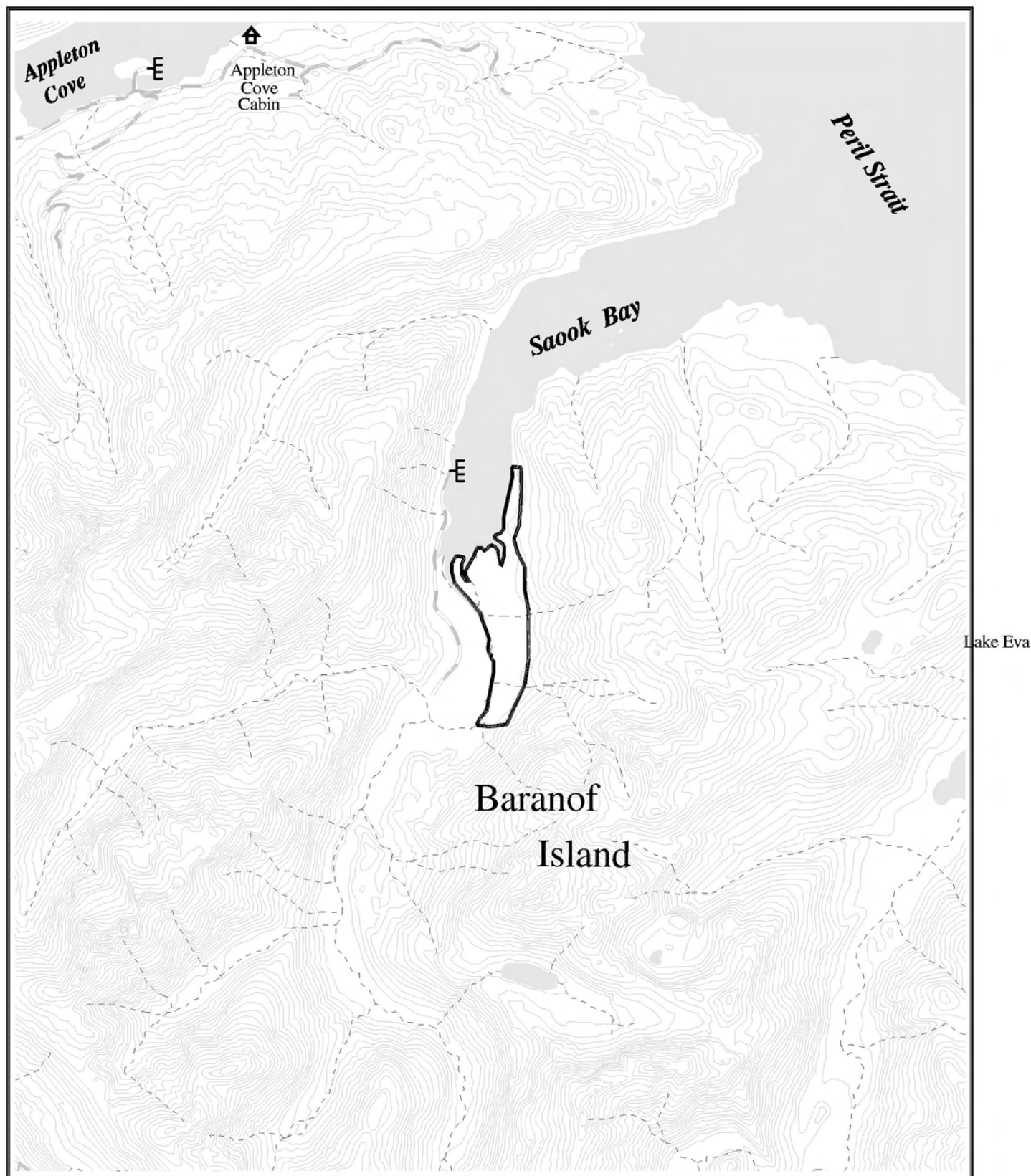
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Saook Bay Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-04A Timber Production Roaded Modified 300
General Characteristics	Broad meadows at end of fjord provide easy walking. Flowers and vegetation are plentiful in the early summer. There is a wildlife trail through large stand of trees at the head of the meadow, and bear trails with obvious footprint paths. Salmon are present in a stream in the late summer. There has been timber harvest in the vicinity.
Historical Use	Commercial outfitter/guides used this area in 1999 - 2001.
Access	The anchorage is protected during most weather conditions. Skiffs can land on the west side of the meadows next to a small stream.
Facilities	None
Attractions	Meadows at end of fjord, stand of large trees
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Vegetation ○ Riparian ○ Brown bear viewing
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04A SAOOK BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

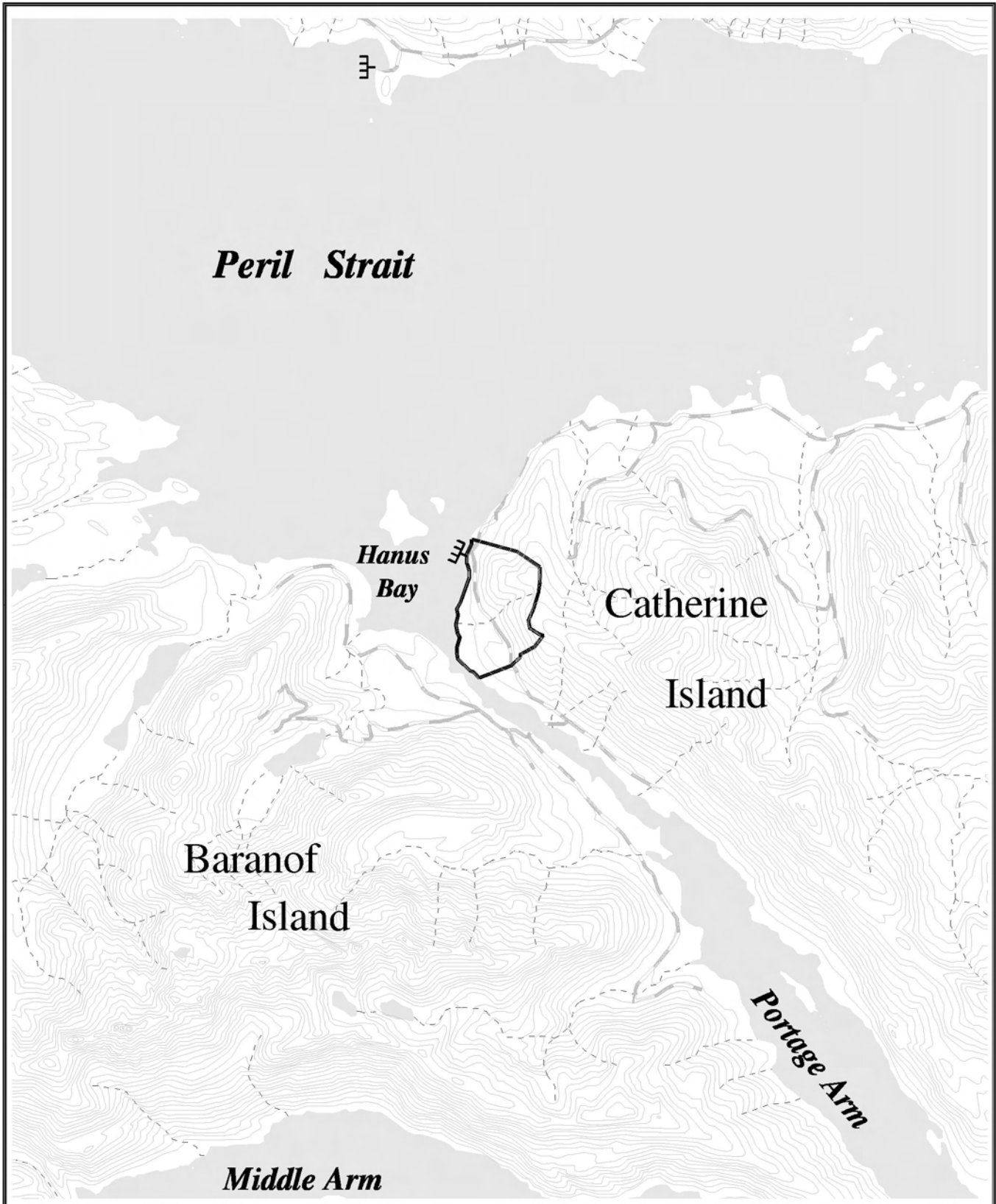
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Hanus Bay Alternative 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-04B Scenic Viewshed Roaded Modified 278
General Characteristics	There has been timber harvest in the area. A meadow at the back of the bay reaches through to Portage Arm of Kelp Bay.
Historical Use	Commercial outfitter/guides used this general area during 1999-2001.
Access	There is a protected anchorage. Skiff landings on the beach are possible at most tides.
Facilities	Road, marine access point, Forest Science Lab research cabin
Opportunities	Interpretive opportunities for forest succession.
Attractions	Hiking on road, wildlife viewing
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> • Bald eagles • Brown bear viewing • Vegetation • Riparian • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04B HANUS BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

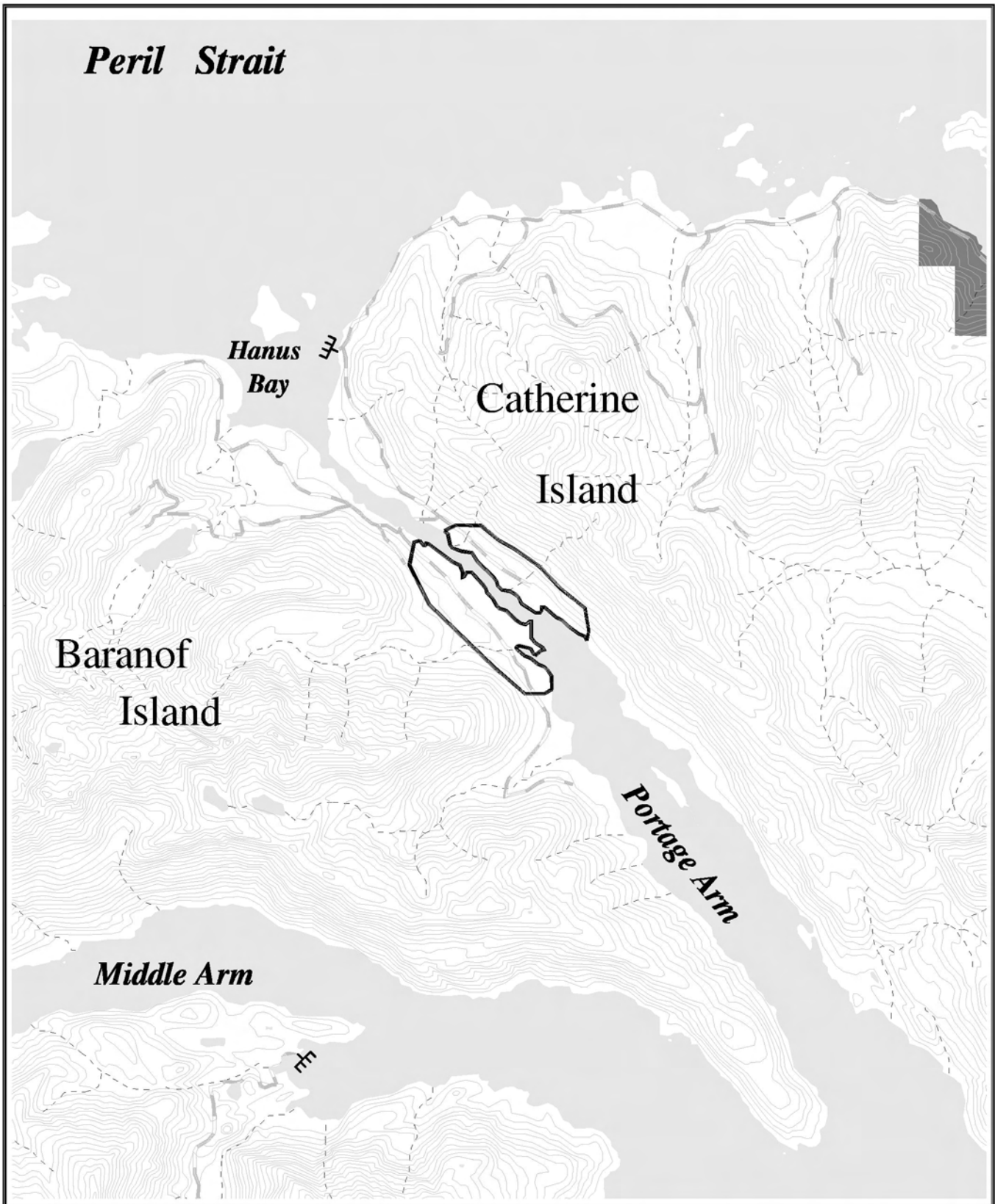
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Portage Arm Alternative 3	
Type	Enclave
Use Area	04-04B
LUD	Modified Landscape, Scenic Viewshed, Timber Production
ROS	Roaded Modified
Acres	424
General Characteristics	Timber harvest is in the vicinity. The meadow at the back of Portage Arm reaches through to Hanus Bay.
Historical Use	Logging took place in this area. Commercial outfitting/guiding did not occur in this area in 1999 - 2001.
Access	Strong westerly winds blow through the portage creating a poor anchorage. The location for landing a skiff is dependent on the tidal stage.
Facilities	Roads
Attractions	Wildlife viewing, hiking in meadows or along beach fringe forest
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Riparian • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Baranof Island Area, Designation Habitat and Harvest

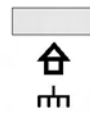
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04B PORTAGE ARM



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



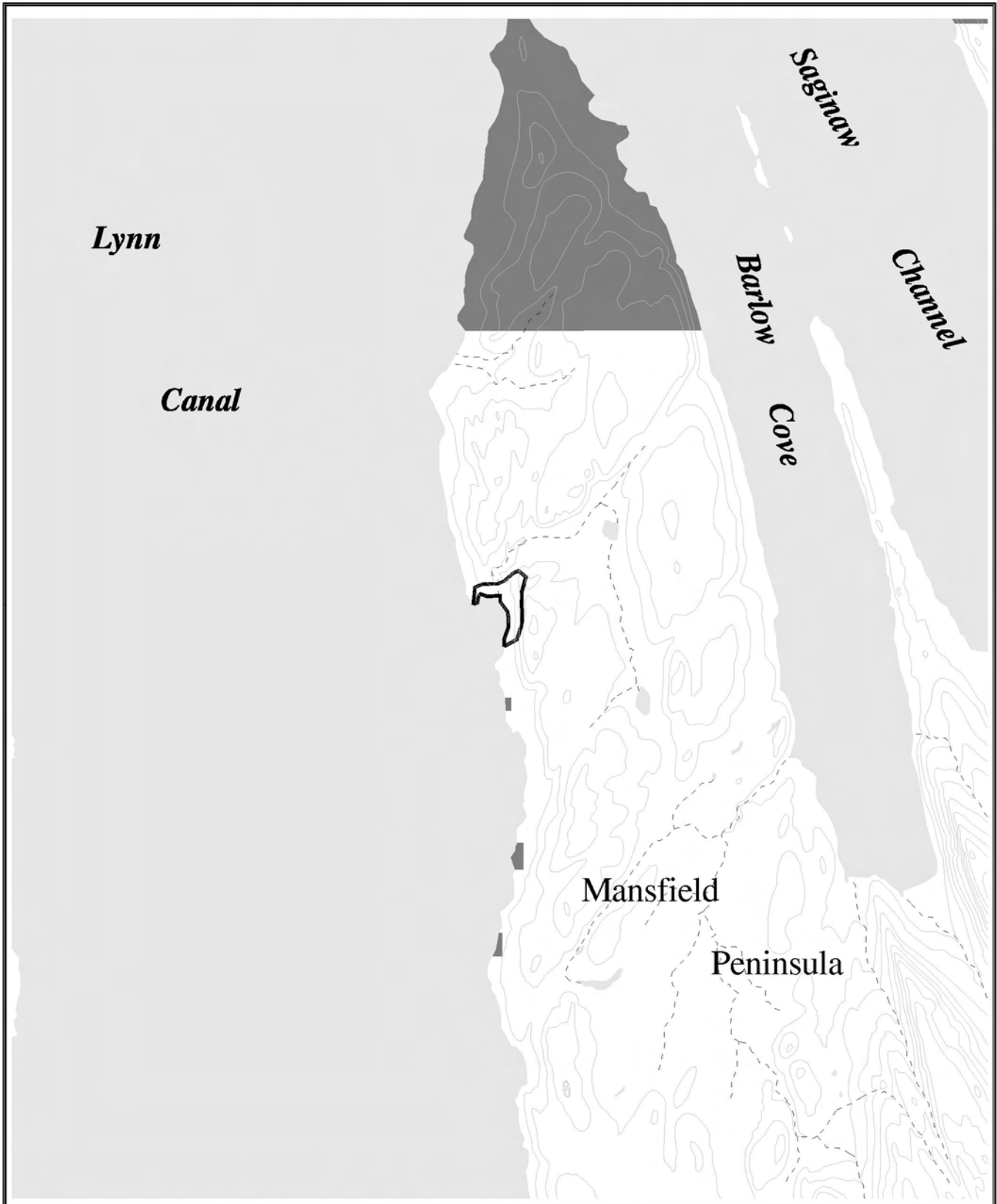
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Cordwood Creek Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-08 Semi-Remote Recreation Semi-Primitive Motorized 48
General Characteristics	<p>Cordwood Creek is a small, tannic creek that drains an inland muskeg lake on the west side of the Mansfield Peninsula on Admiralty Island. The site generally has a 40-yard-wide flat portion inside the trees that rises steeply to an uplifted beach. Shoreline near the outflow is rocky but becomes flatter with large trees along the shoreline. There is a very narrow fringe of beach grass and forbs between the gravel and tree line for the whole site.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001. Unguided recreationists use this area. Logging has previously occurred in the area.</p>
Access	<p>Although the cove faces southwest on the east side of Lynn Canal it is large enough to provide some protection. The beach has large cobble and gravel in the central part of the cove.</p>
Facilities	<p>None</p>
Concerns and/or Opportunities	<p>Cordwood Creek is exposed to certain winds.</p>
Attractions	<p>Opportunities for a beach walk on northern Admiralty Island and fishing.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Riparian ○ Vegetation ○ Bald eagles • Cultural sites will be avoided
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Admiralty Island Area, Designation Habitat and Harvest</p>

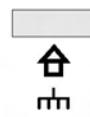
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-08 CORDWOOD CREEK



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



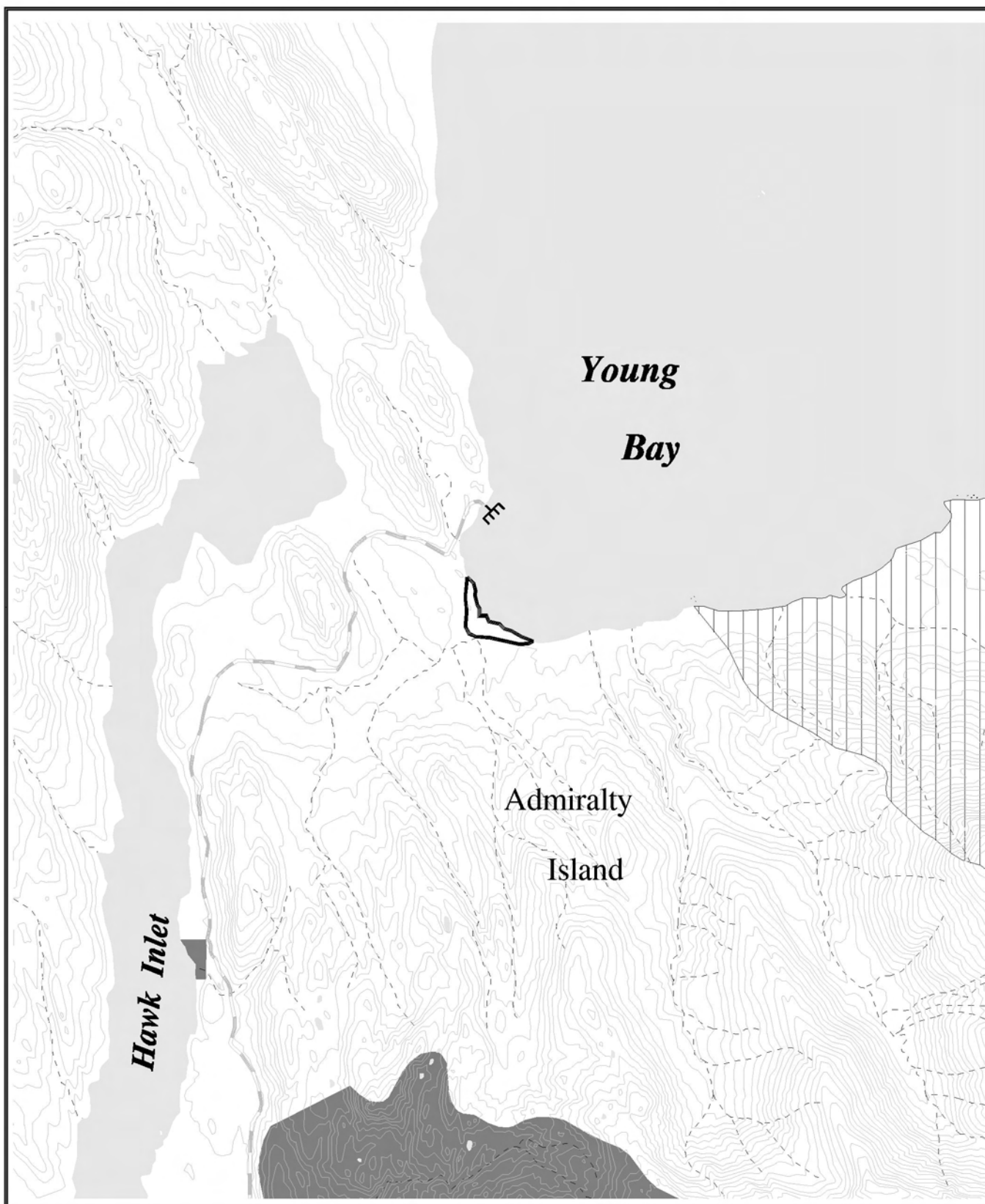
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Fowler Creek Alternative 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-08 Semi-Remote Recreation Roaded Natural 42
General Characteristics	<p>This site is located at the base of the Mansfield Peninsula on Admiralty Island, and has a fairly large tide flat of cobble and gravel. Within the tree line there is a flat area, about 20 yards wide, with large trees that slopes to an uplifted beach area. A raised gravel bar at the creek mouth occurs on the north side. To the south is a raised spit further inland that offers a good view upstream, and a large meadow edged by spruce extending into the meadow.</p>
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	<p>Visitation will be weather-dependent due to wind exposure. The best access would be at the northern or southern ends of the site away from the tide flat. Ashore, the terrain is flat and provides for good walking. The creek can easily be crossed without waders.</p>
Facilities	None
Concerns and/or Opportunities	<p>This area is a local hunting area. Beware of limited visibility into the main creek stem, due to potential bear/human interactions. There is a private parcel nearby.</p>
Attractions	<p>Good opportunities for wildlife viewing, particularly shorebirds and bears.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian ○ Brown bear viewing ○ Waterfowl-- timing restriction for molting birds 7/1 to 9/15 • No large group camping. • No consumptive uses by large groups. • Outfitter/guides will not trespass on private land. • Guided activities must not interfere with other forest management activities.
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Admiralty Island Area, Designation General Use</p>

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-08 FOWLER CREEK



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



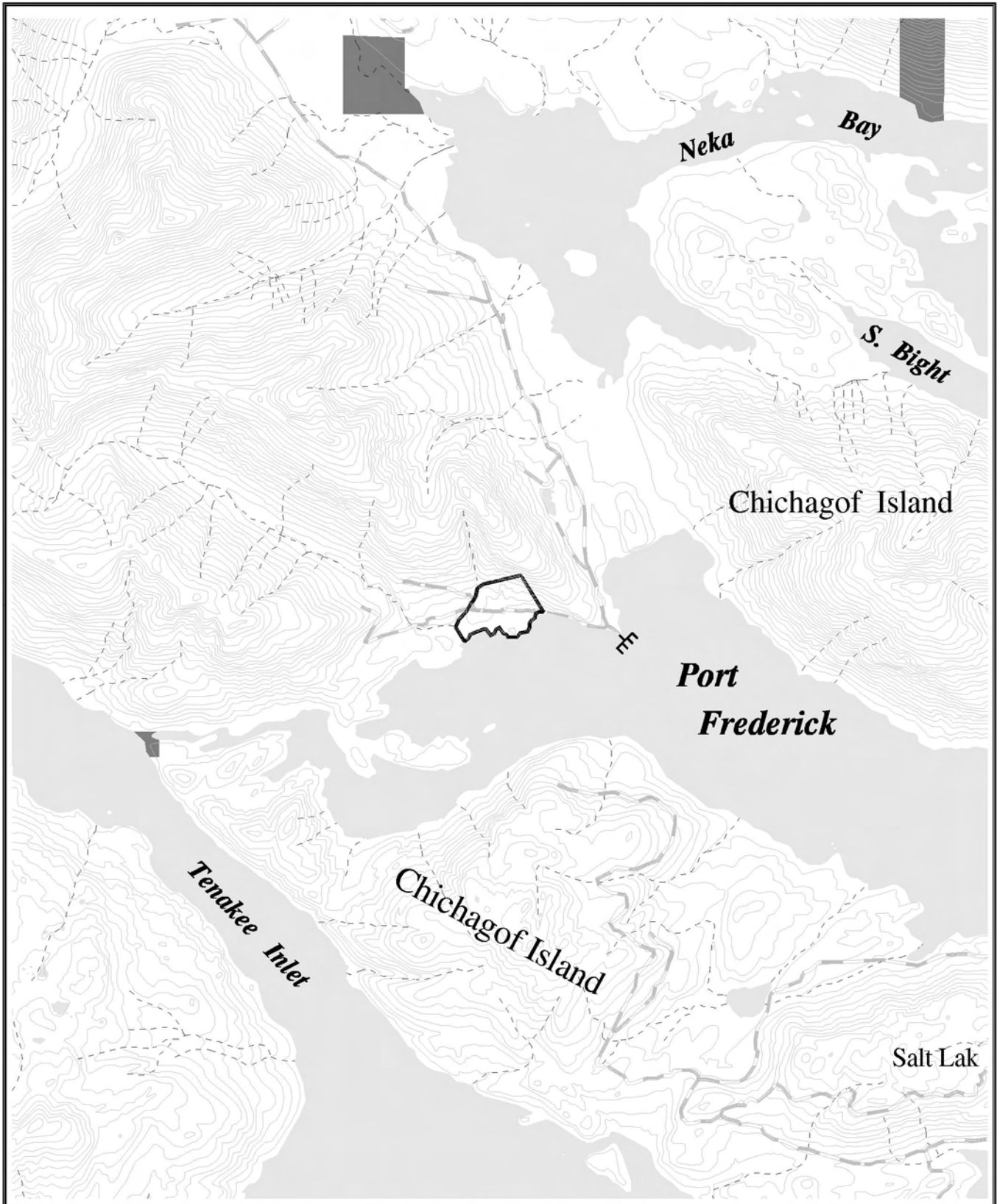
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Eight-Fathom Dock Area Alternatives 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-11 Scenic Viewshed Roaded Modified 110
General Characteristics	The site was previously used as a timber transfer facility. It has a scenic setting in Eight-Fathom Bay.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	It is sixteen miles from Hoonah. The dock accommodates floatplanes and boats up to 35 feet in length.
Facilities	There is a road, a Forest Service bunkhouse, and an administrative dock
Concerns and/or Opportunities	The hardened site will sustain repeated foot traffic. There are opportunities for interpretation on forest management. There is a new hot springs developed site in the area.
Attractions	Scenic setting, wildlife viewing
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Riparian • Guided recreationists will not block use of the dock or interfere with other forest management activities. • Outfitter/guide boats will not tie directly to the dock or be left unattended.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Undeveloped Public Recreation and Tourism

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 EIGHT FATHOM DOCK



- | | | | | | |
|--|---------------------------|--|--------------------------|--|---------------------------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water Recreation Cabin |
| | Streams | | Wilderness | | Marine Access Point |
| | Existing Road | | Outside of Project Area | | |



1 0.5 0 1 2 Miles



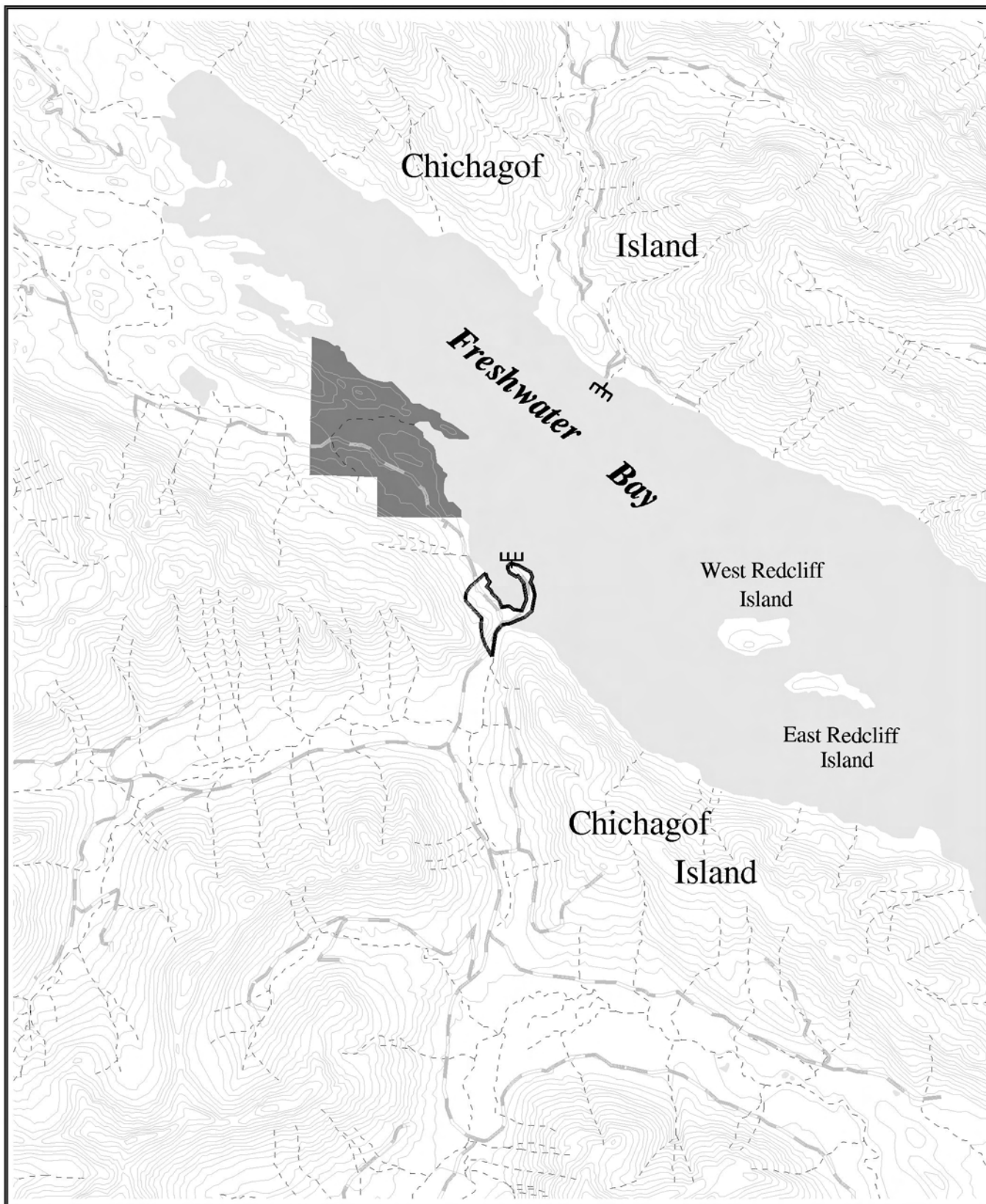
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Kennel Creek Alternative 3, 5	
Type Use Area LUD ROS Acres	Enclave 04-11 Scenic Viewshed Roaded Modified 73
General Characteristics	<p>This area is centrally located in Freshwater Bay. The site was previously used as a logging camp and a timber transfer facility. This site is regenerating naturally. The area offers excellent views of Freshwater Bay, Chatham Strait, Admiralty Island, and the mountain peaks above Juneau. It is adjacent to Kennel Creek.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001.</p>
Access	<p>The area may be accessed from Forest Road 8508. The dock accommodates floatplanes and boats up to 35 feet in length.</p>
Facilities	<p>Road, marine access point, Forest Service bunkhouse, dock</p>
Concerns and/or Opportunities	<p>The hardened site will sustain repeated foot traffic. There are opportunities to interpret forest management activities.</p>
Attractions	<p>It has a scenic setting, with opportunities for wildlife viewing (especially brown bear), and anadromous fisheries.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Riparian ○ Vegetation • Users will not block use of the dock. • Outfitter/guide boats will not tie directly to the dock. • Guided activities will not interfere with other forest management activities.
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Harvest</p>

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 KENNEL CREEK



- | | | | | | |
|--|---------------------------|--|--------------------------|--|---------------------------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water Recreation Cabin |
| | Streams | | Wilderness | | Marine Access Point |
| | Existing Road | | Outside of Project Area | | |

1 0.5 0 1 2 Miles

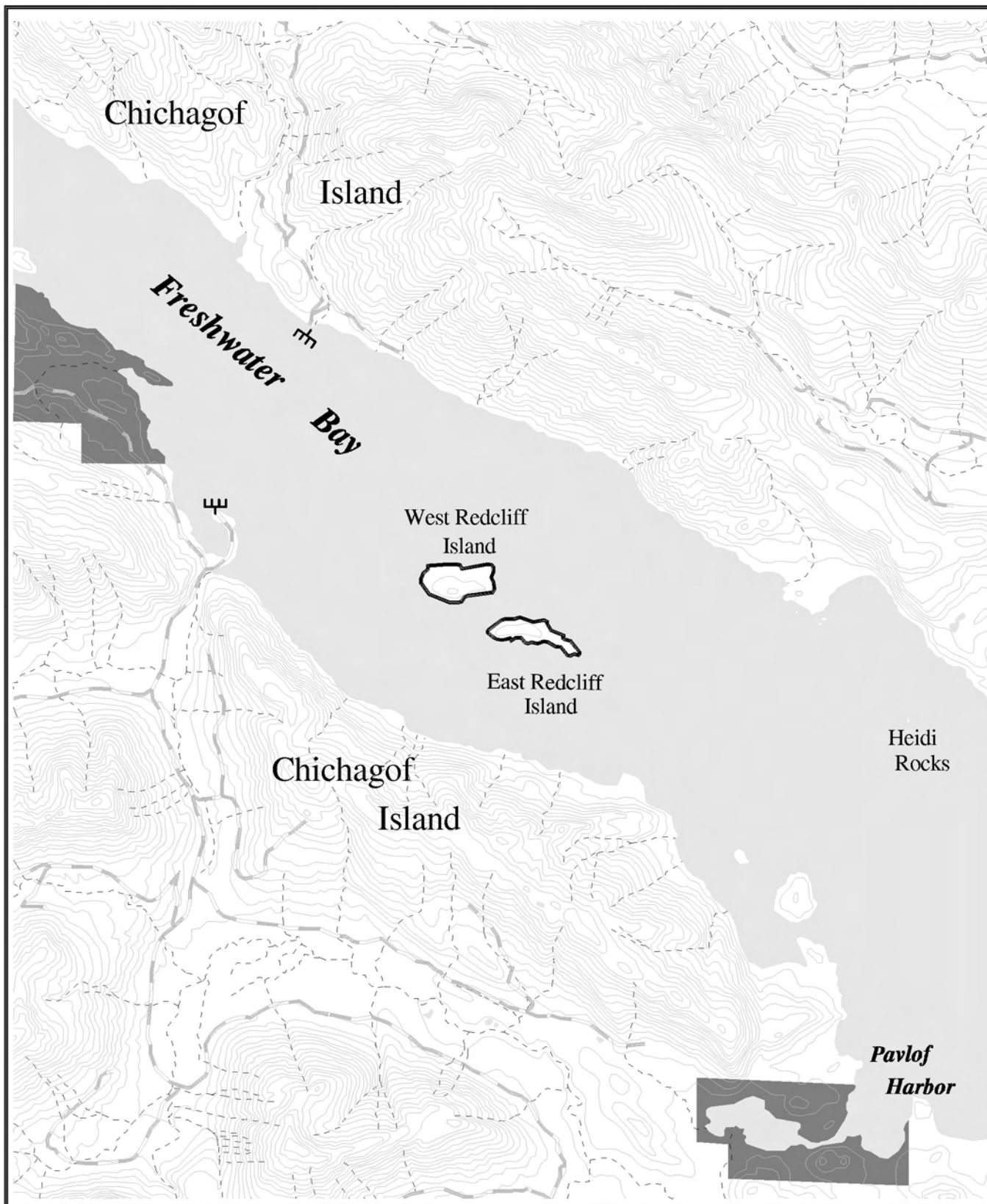
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Red Cliff Islands Alternatives 3, 5	
Type	Enclave
Use Area	04-11
LUD	Semi-Remote Recreation
ROS	Semi-Primitive Motorized
Acres	119
General Characteristics	This area features two isolated islands, East & West Red Cliff, in the middle of Freshwater Bay. There is an elevation rise of 240 feet with scenic red cliffs. It does not receive much unguided use.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	It is six miles from entrance of Freshwater Bay with good protected anchorage, and two miles from Kennel Creek float dock and Hoonah road system.
Facilities	None
Concerns and/or Opportunities	There is an opportunity to interpret fox farm ruins on West Red Cliff Island.
Attractions	This area has a scenic setting, with excellent views across Chatham Strait of Admiralty Island and mainland mountains behind Juneau. There are some wildlife viewing opportunities.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals • No large group camping. • No consumptive uses by large groups. • Guided activities must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 RED CLIFF ISLANDS



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

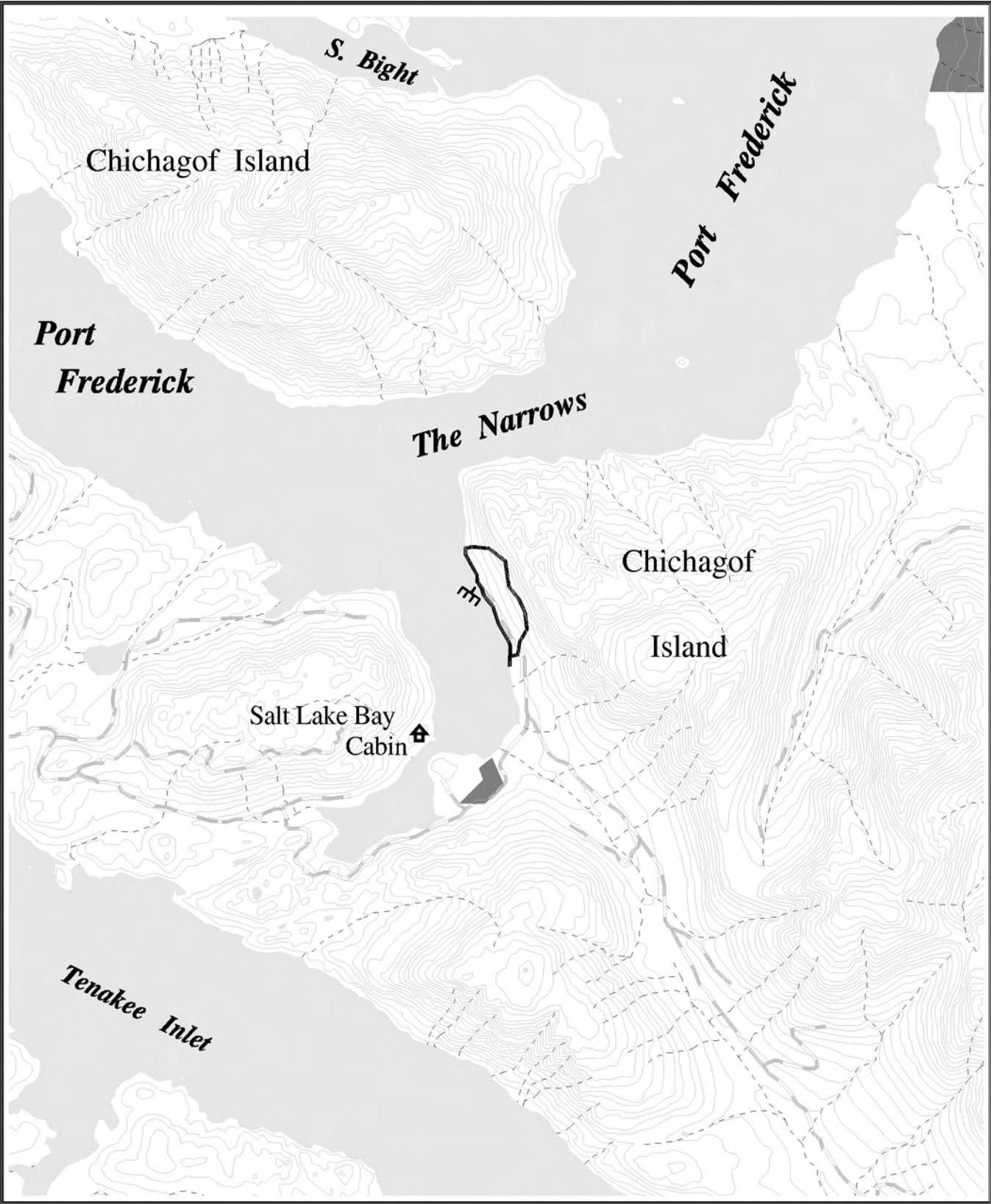
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

<p>Large Group Areas</p> <p>Salt Lake Bay Dock Alternative 3, 5</p>	
Type Use Area LUD ROS Acres	Enclave 04-11 Scenic Viewshed Roaded Modified 91
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	This area is thirteen miles from Hoonah.
Facilities	There is a road, a marine access point, and an administrative dock. The dock accommodates boats up to 35 feet in length and floatplanes. Salt Lake Bay Forest Service recreation cabin is in the vicinity.
Concerns and/or Opportunities	Hardened site will sustain repeated foot traffic. There are interpretive opportunities.
Attractions	There are wildlife viewing opportunities, especially for brown bear.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing • No large group camping • No consumptive uses by large groups • Outfitter/guide boats may not tie directly to the dock or leave boats unattended, and guided users must not block dock use. • Guided use must not interfere with other forest management activities. • Guided use must not interfere with Salt Lake Bay cabin use.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 04-11 SALT LAKE BAY DOCK



Large Group Area Boundary
Streams
Existing Road



Non National Forest Land
Wilderness
Outside of Project Area



Salt and Fresh Water
Recreation Cabin
Marine Access Point



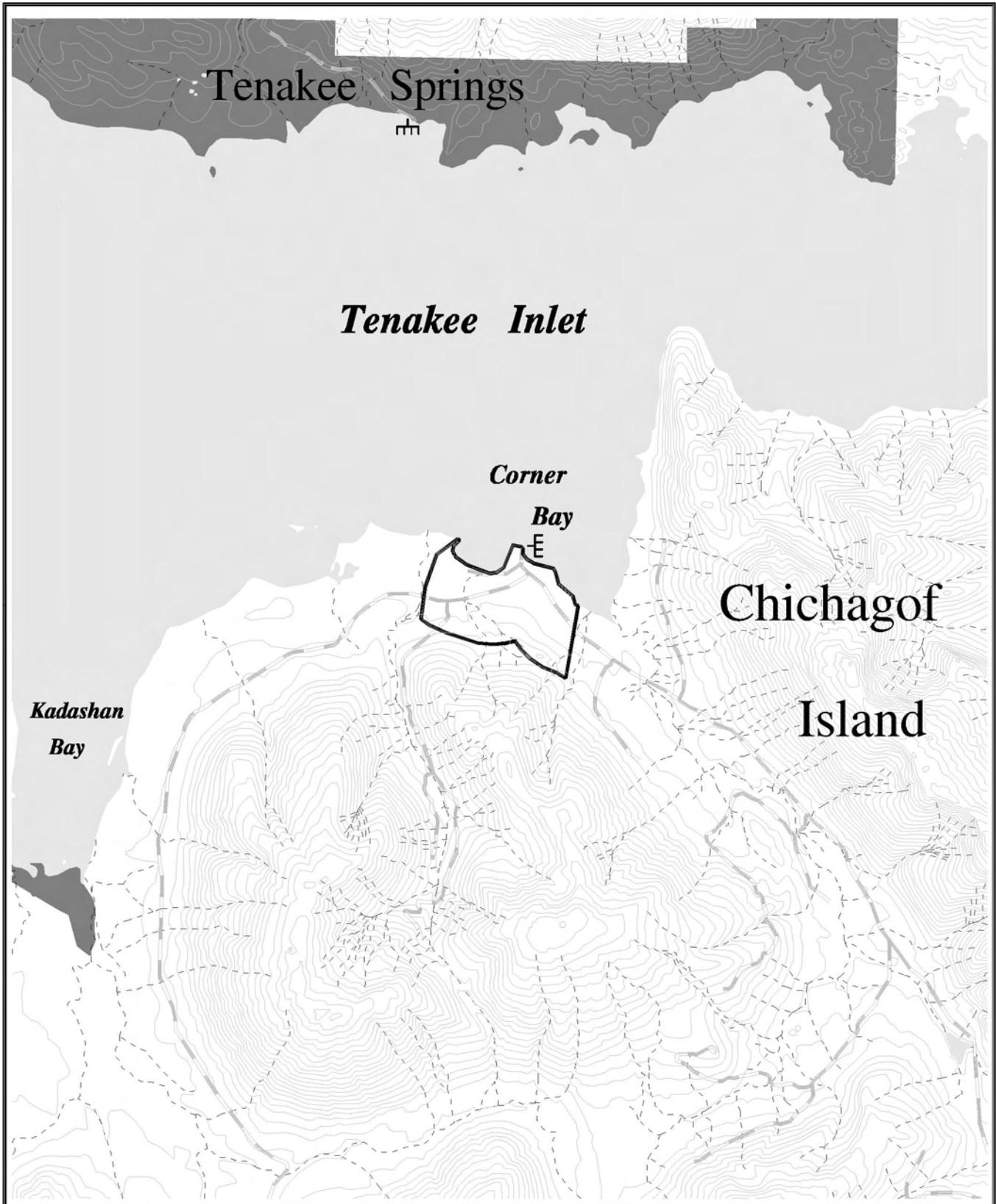
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Corner Bay Road Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 04-12 Scenic Viewshed, Timber Production Roaded Modified 398
General Characteristics	Timber has been harvested from this area. There are managed stands of timber with a variety of silvicultural treatments.
Historical Use	Commercially guided groups used this area in 1999 - 2001.
Access	Many miles of road are suitable for high clearance vehicles.
Facilities	This area has a road and a marine access point. The Forest Service maintains a dock at Corner Bay where boats and floatplanes may tie up. Corner Bay is the site of a Forest Service administrative site that consists of a bunkhouse, garage, water system, and electrical generator.
Concerns and/or Opportunities	There are interpretive opportunities for forest management.
Attractions	Hiking, sightseeing, wildlife viewing
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Brown bear viewing ○ Bald eagles ○ Riparian ○ Vegetation • Guided use of Corner Bay dock is permitted but guides must not leave boats unattended or interfere with administrative use. • Guided use must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-12 CORNER BAY ROAD



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

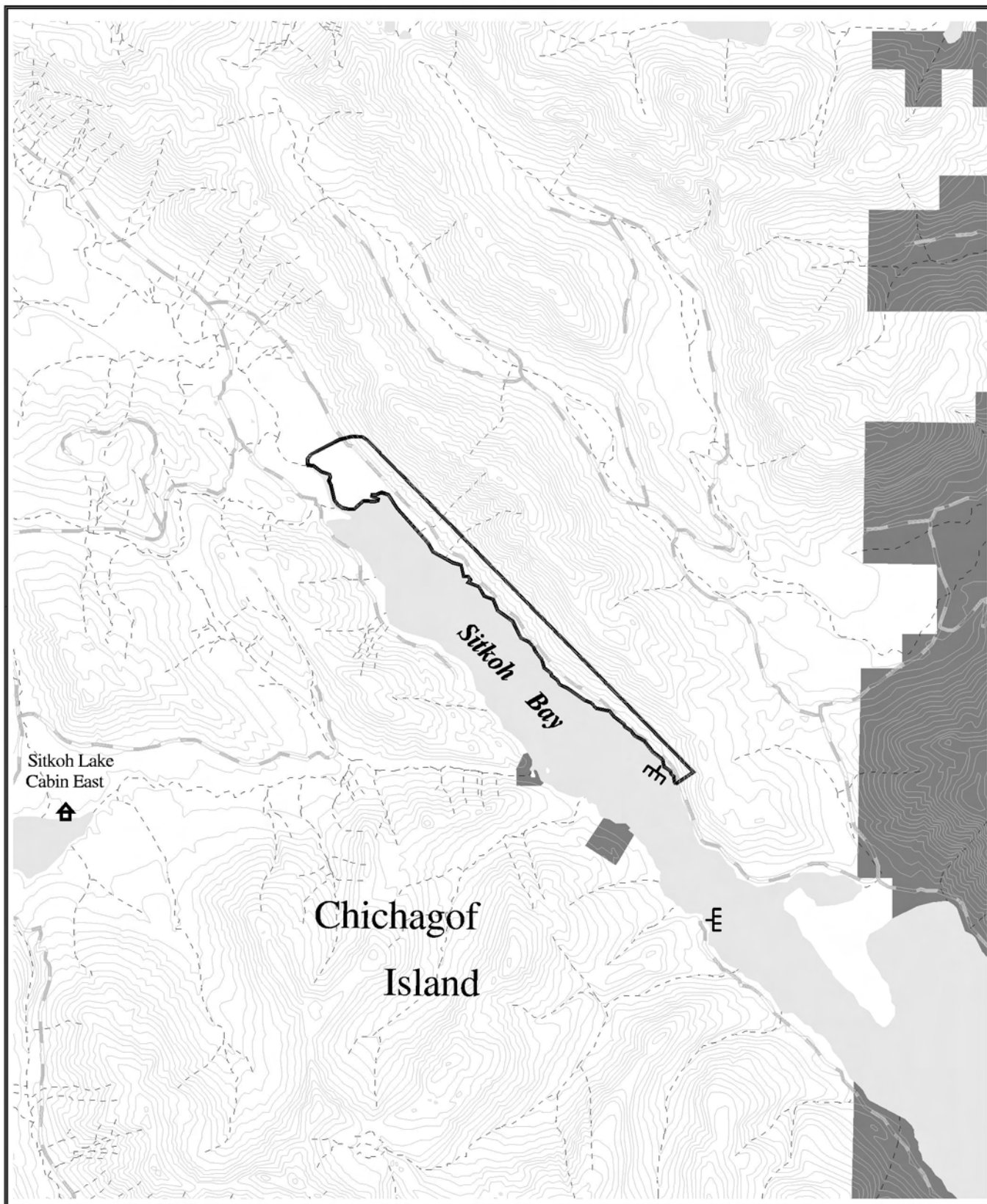
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Sitkoh Bay Road Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 04-13 Modified Landscape Roaded Modified 454
General Characteristics	A scenic bay and a past timber harvest are visible in the area. The road on the north side of the bay passes just above the shoreline providing easy access.
Historical Use	This area was logged in the 1970s. Commercial outfitter/guides used the area in 1999 - 2001.
Access	There is a protected anchorage within the bay. Skiffs can land along the shore but the exact spot depends on the tide. During high tide it is possible to land at the north end of the meadow at the end of the bay.
Facilities	Road and marine access point.
Attractions	Easy access to an old roadbed for walking. Opportunities for forest management interpretation. Opportunity to hike to the estuary at the head of the bay and view wildlife.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Riparian ○ Vegetation • Guided use must not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Undeveloped Public Recreation and Tourism

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-13 SITKOH BAY ROAD



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

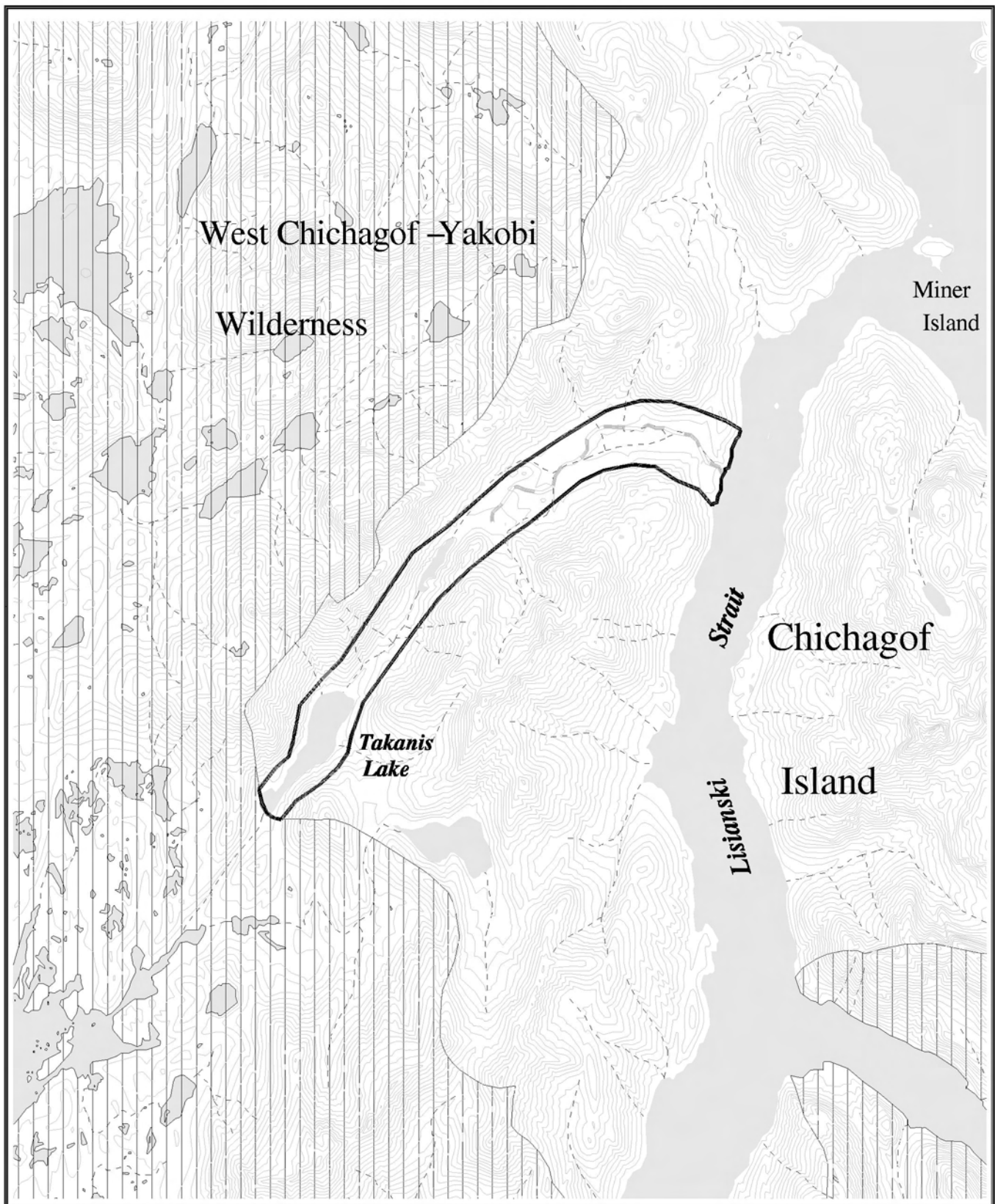
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Bohemia Basin Alternatives 3,5	
Type Use Area LUD ROS Acres	Enclave 04-15 Semi-Remote Recreation. Semi-Primitive Motorized 1,043
General Characteristics	<p>This area has an isolated setting adjacent to West Chichagof Yakobi Wilderness. There is an old mining claim in Bohemia Basin with scenic cliffs and numerous waterfalls along Lisianski Strait and Lisianski Inlet. It is approximately eight miles from Pelican and ten miles from the outer coast of Yakobi Island and west Chichagof.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001.</p>
Access	<p>There is a dock at this location that will accommodate boats up to 50 feet in length. This dock is under the jurisdiction of the City of Pelican. It is in poor condition.</p>
Facilities	<p>This site was the staging area for a mining operation in Bohemia Basin valley. The operation was abandoned in the early 1980s and the site has been reclaimed. There is a primitive four-mile hiking trail to Takanis Lake.</p>
Concerns and/or Opportunities	<p>The dock is in poor condition. The mining road serves as a good hardened trail. Cultural sites are present.</p>
Attractions	<p>Boat dock, scenic setting adjacent to Wilderness, Takanis Lake trail, wildlife viewing opportunities</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Brown bear viewing ○ Bald eagles ○ Riparian ○ Vegetation • Cultural sites will be excluded from guided use. • Outfitter/guides must obtain permission to use the dock.
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use</p>

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-15 BOHEMIA BASIN



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles



Mapscale 1:63360

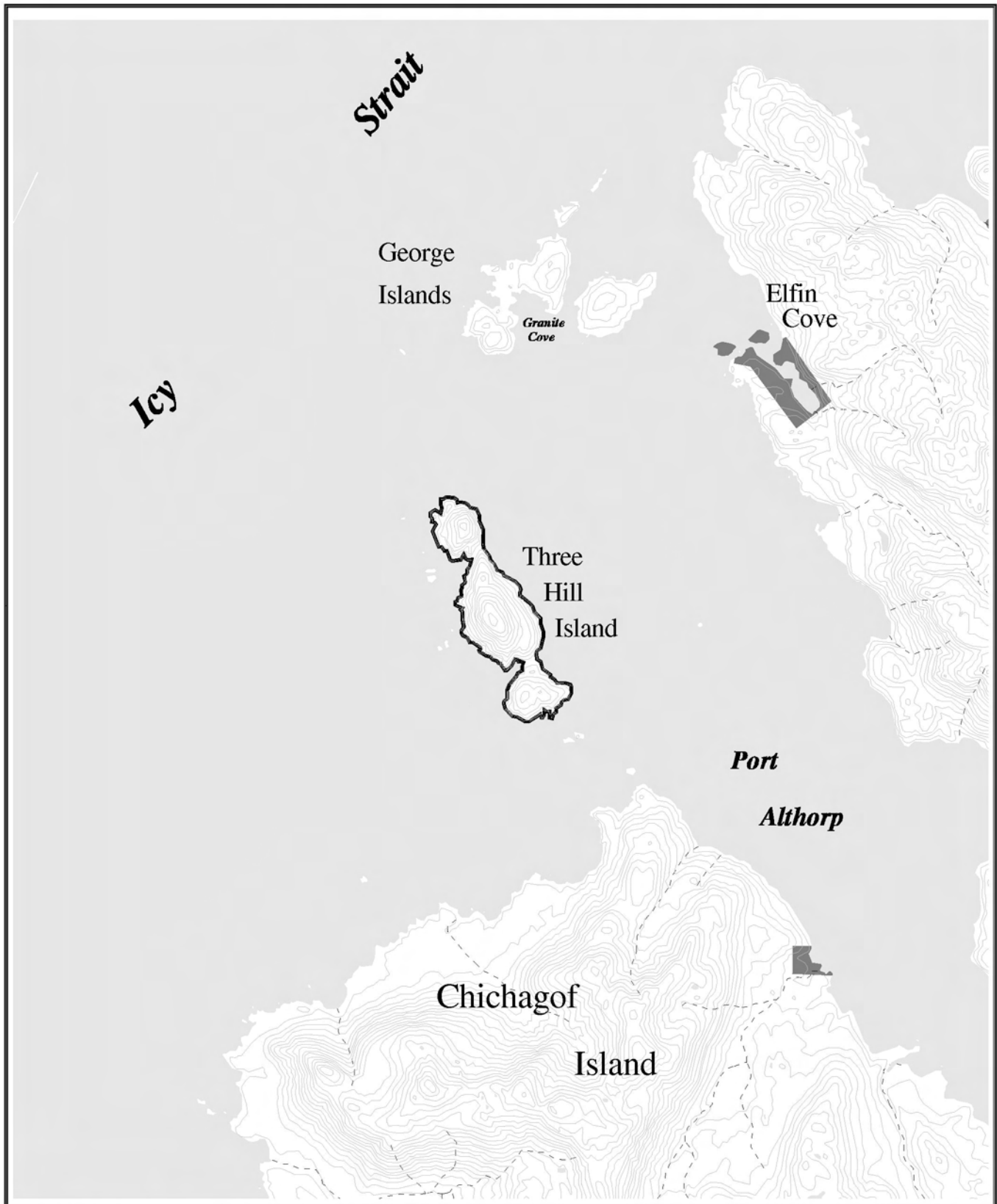
Contour Interval is 100 Feet



Appendix B—Large Group Areas

Large Group Areas	
Three Hill Island Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Enclave 04-15 Semi-Remote Recreation Semi-Primitive Motorized 362
General Characteristics	<p>This area is located near the entrance to Port Althorp. It is a small island with secluded sandy coves, sea bird rookeries, and terrestrial and marine mammal viewing opportunities. This island offers a variety of recreation and wildlife viewing opportunities including hiking, sightseeing, camping, and beach combing. It has a difficult anchorage.</p>
Historical Use	Outfitter/guides used this area in 1999 - 2001.
Access	<p>Three Hill Island is within five miles of Elfin Cove and receives unguided use from residents and visitors for hiking, sightseeing, beach combing, and camping. Large boats normally anchor on the east side of the island and skiff ashore. Smaller skiffs and kayaks also approach from the east side, as the west shore is very rocky and exposed to large swells from Cross Sound.</p>
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	Elfin Cove residents use this area. There are seal and/or sea lion haul outs and seabird rookeries.
Attractions	<p>This area has a scenic setting with views across Cross Sound of Glacier Bay National Park. There are opportunities for wildlife viewing; particularly sea bird rookeries.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Marine mammals ○ Bald eagles ○ Seabird rookeries ○ Vegetation ○ Riparian
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat

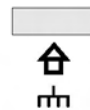
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-15 THREE HILL ISLAND



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



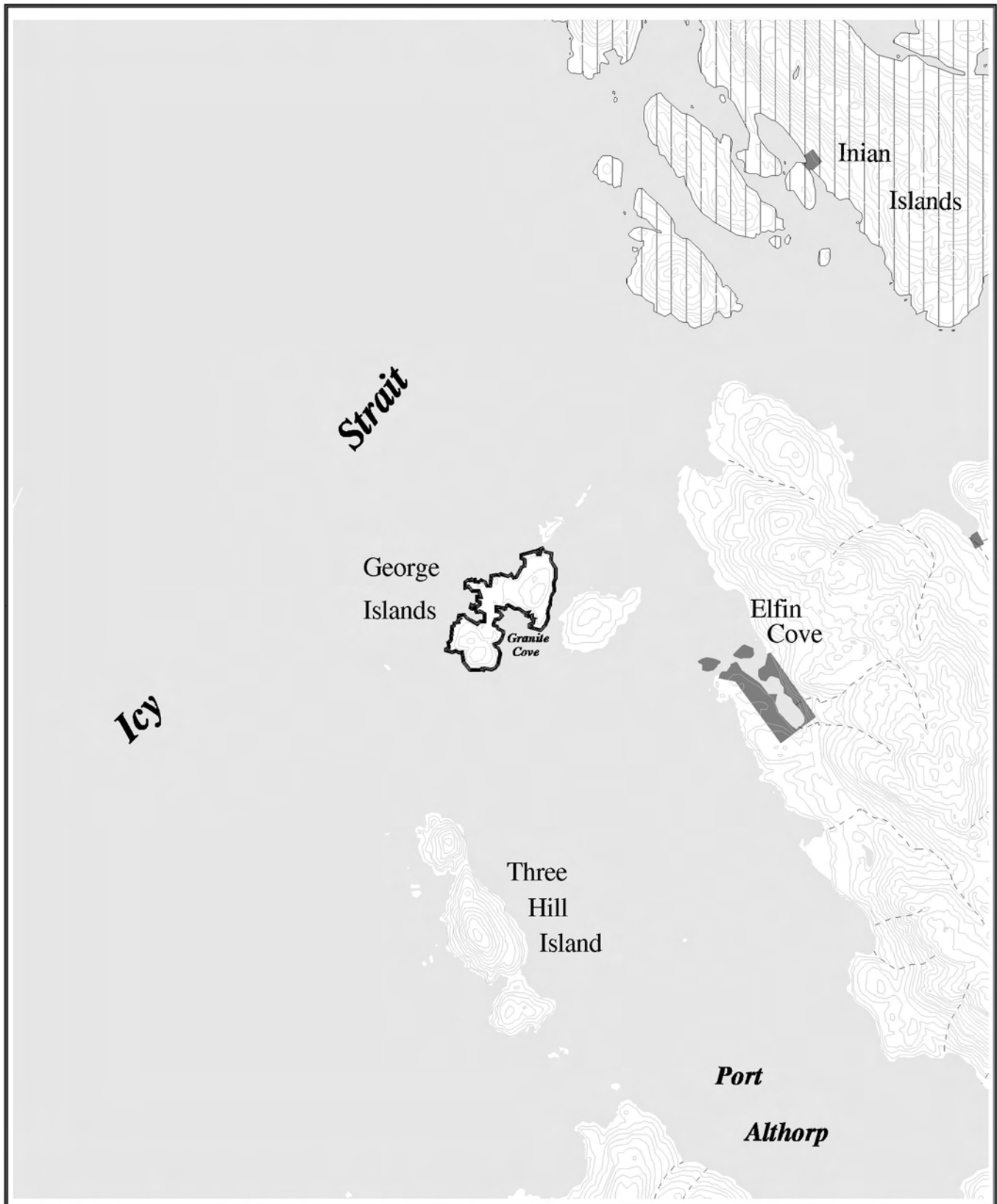
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
George Island Alternatives 3, 4, 5	
Type	Enclave
Use Area	04-16D
LUD	Semi-Remote Recreation
ROS	Semi-Primitive Motorized
Acres	188
General Characteristics	Granite Cove is approximately two miles from the community of Elfin Cove. The area is very scenic with isolated coves, open forest, and excellent views across Cross Sound. This site offers an excellent opportunity to interpret the historic use of the island as a WWII military site.
Historical Use	It is a popular location for guided use.
Access	The site is two miles from Elfin Cove. There is an excellent beach for launching small boats and kayaks at Granite Cove. It has a good protected anchorage for mid-size cruise ships.
Facilities	A primitive ¼ mile trail leads to a WWII cannon.
Concerns and/or Opportunities	The trail has been receiving an increasingly high amount of use over the previous few years and needs to be improved to sustain the increased use. There are interpretive opportunities at the WWII cannon site.
Attractions	There are scenic views of Cross Sound, Cape Spencer, Glacier Bay National Park, and Brady Glacier. This area has opportunities for wildlife viewing and hiking on the WWII Cannon Trail. It is close to Elfin Cove.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ No large group camping ○ No consumptive uses by large groups ○ Cultural resource mitigation • Additional levels of guided use on the WWII Cannon trail will not be permitted until the trail is reconstructed.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-16D GEORGE ISLAND



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



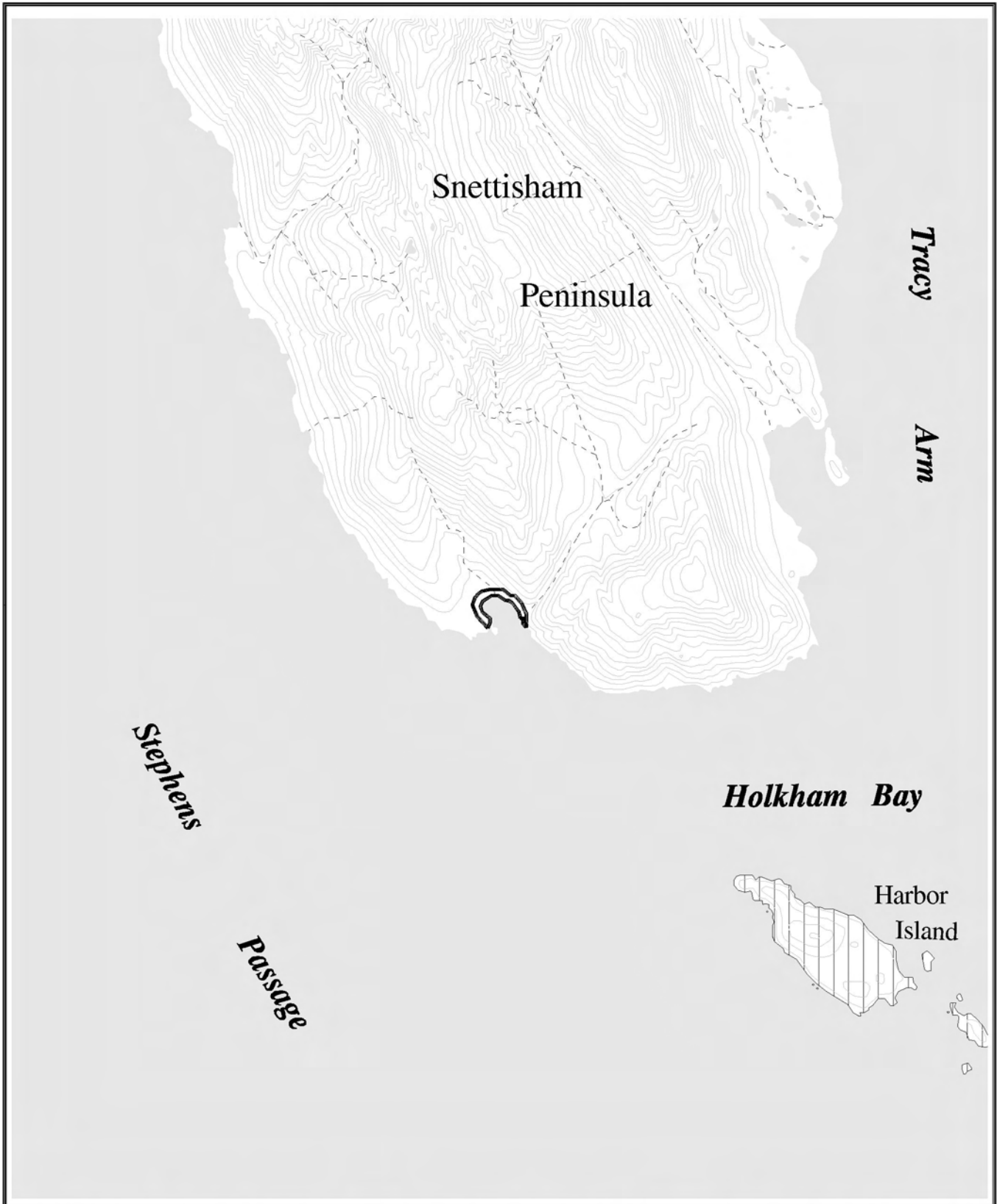
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Point Coke Alternatives 3, 5	
Type Use Area LUD ROS Acres	Fifteen-Percent Area 01-05B Old Growth Semi-Primitive Motorized 22
General Characteristics	This south-facing site is located at the entrance to Holkham Bay. The cove is approximately ¼ mile across. Surrounding the cove is a large rock wall with small grottoes and large boulders on the east side and a large meadow on the west side. A second scenic creek bisects the site.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	A small pebble beach allows for skiff landings at most tide stages. Anchorage and access could be difficult under some weather conditions due to exposure to Stephens Passage. Icebergs may occasionally be in the area.
Facilities	None
Attractions	Proximity to Tracy Arm Wilderness allows for a shore excursion and view of upper Tracy Arm on the same day. This area offers scenic views of Frederick Sound. A variety of wildflowers were noted in the area. It has two creeks and provides some geologic diversity. The large rock outcrop at the southwest side provides excellent views of Stephens Passage and Holkham Bay.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Riparian. ○ Vegetation ○ Bald eagles • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Central/Southern Southeast Area Plan, Region 1-Sumdum North, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 01-05B POINT COKE



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



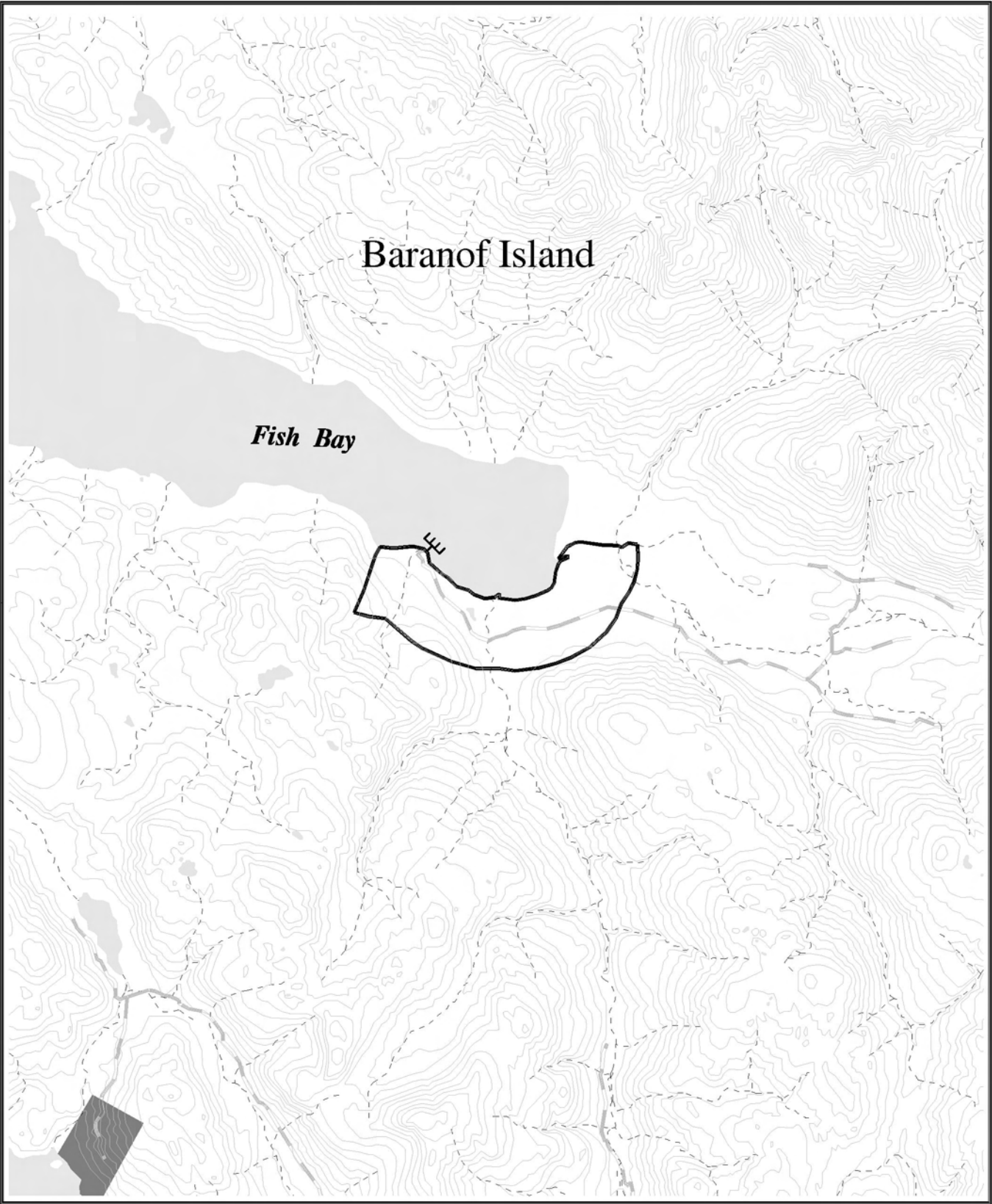
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Fish Bay Alternative 3	
Type Use Area LUD ROS Acres	Fifteen-Percent 04-03 Old Growth Forest Semi-Primitive Motorized 701
General Characteristics	The immediate area is unaltered forest but logging is evident in the surrounding area. There are very large grass flats at the head of the bay.
Historical Use	Commercially guided groups used this area in 1999 - 2001.
Access	There is a protected anchorage with skiff access possible at all tidal stages.
Facilities	There is an old logging road.
Attractions	There is an opportunity to view wildlife and to hike along the beach fringe forest and grass flats.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian • No large group camping. • No consumptive uses by large groups. • Guided activities will not interfere with other forest management activities.
Other Management Plans	Northern Southeast Area Plan, Baranof Island Area, Designation Habitat and Undeveloped Public Recreation and Tourism

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 04-03 FISH BAY



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



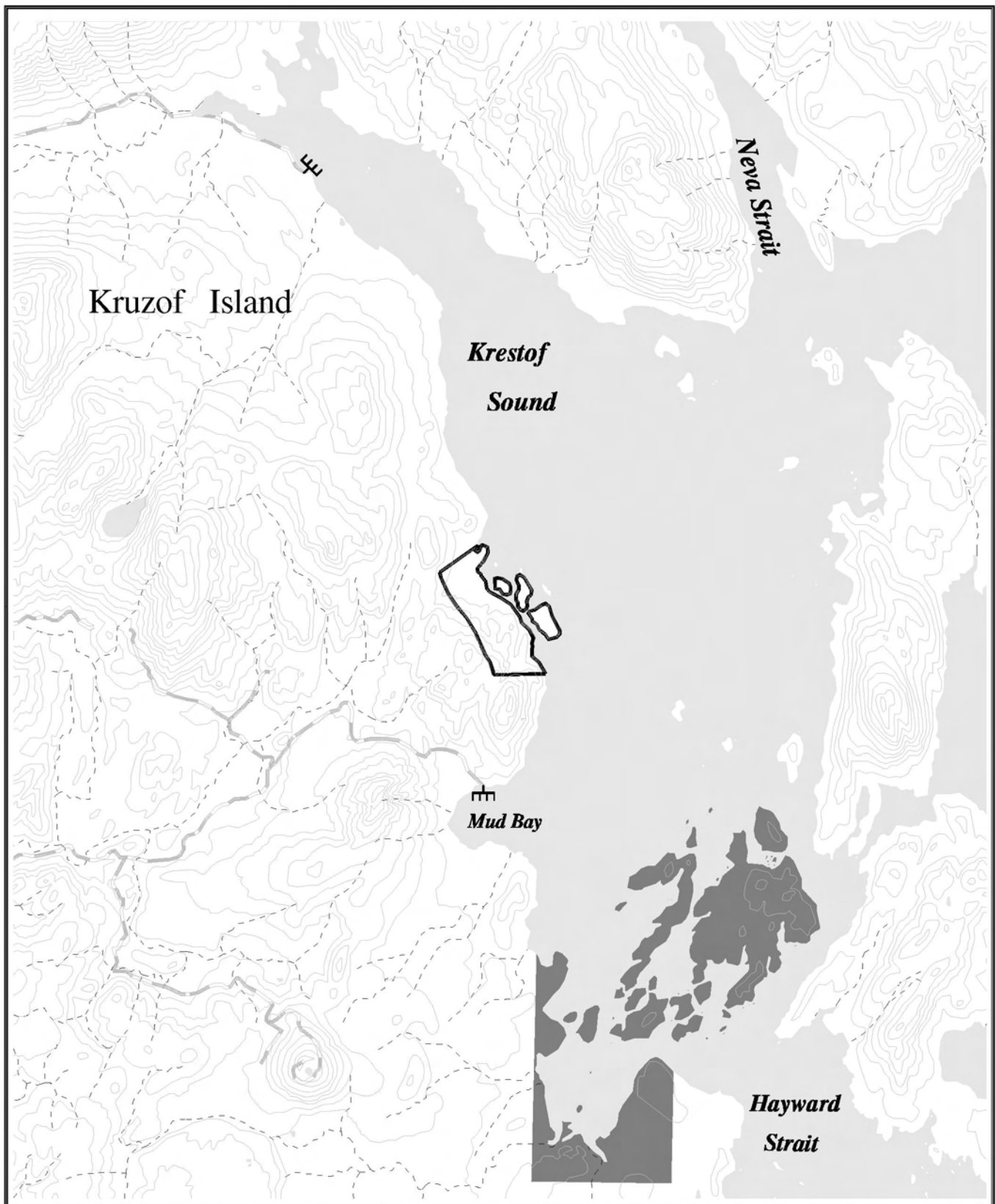
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Nadezhda Islands	
Alternative 3	
Type	Fifteen-Percent
Use Area	04-03
LUD	Semi-Remote Recreation
ROS	Semi-Primitive Motorized
Acres	222
General Characteristics	The area is forested with timber harvest in the vicinity.
Historical Use	Outfitter/guides used this area in 1999 - 2001.
Access	There is a protected anchorage during most weather conditions. Skiff landings are possible on each of the islands.
Facilities	None
Attractions	Hiking in old-growth forest.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian • Guided activities will not interfere with other forest management activities. • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Northern Southeast Area Plan, Baranof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-03 NADEZHIDA ISLANDS



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



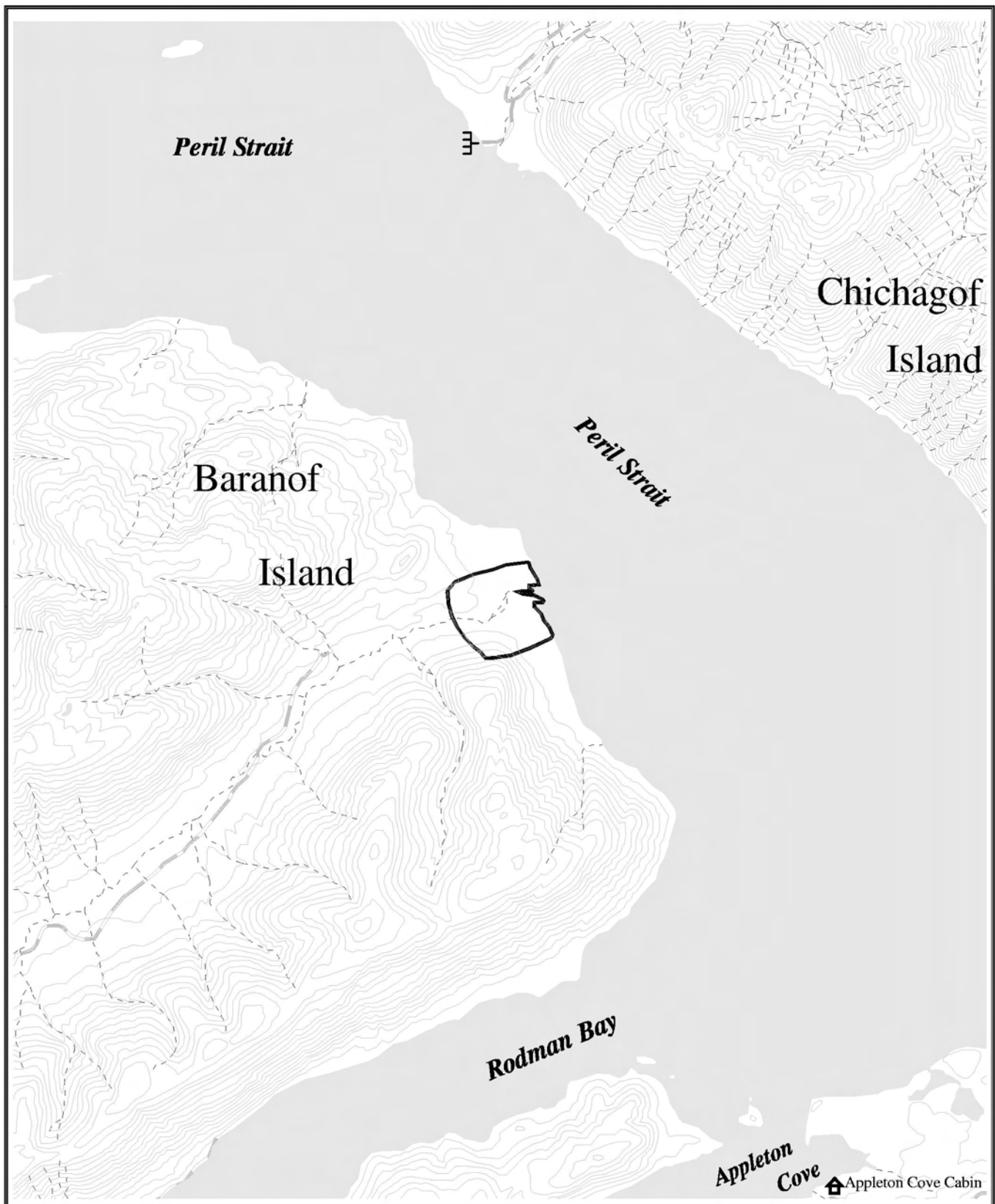
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Duffield Alternative 3	
Type	Fifteen-Percent
Use Area	04-04A
LUD	Old Growth Habitat
ROS	Semi-Primitive Motorized
Acres	223
General Characteristics	Immediate area is unaltered forest but with logging evident in surroundings. Walking along the forest edge and inside the beach fringe is possible.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	Skiff access depends on tidal stage and weather conditions.
Facilities	None
Attractions	Hiking along beach and beach fringe forest and grass flats
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Vegetation ○ Riparian • Guided activities will not interfere with other forest management activities. • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Northern Southeast Area Plan, Baranof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04A DUFFIELD



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



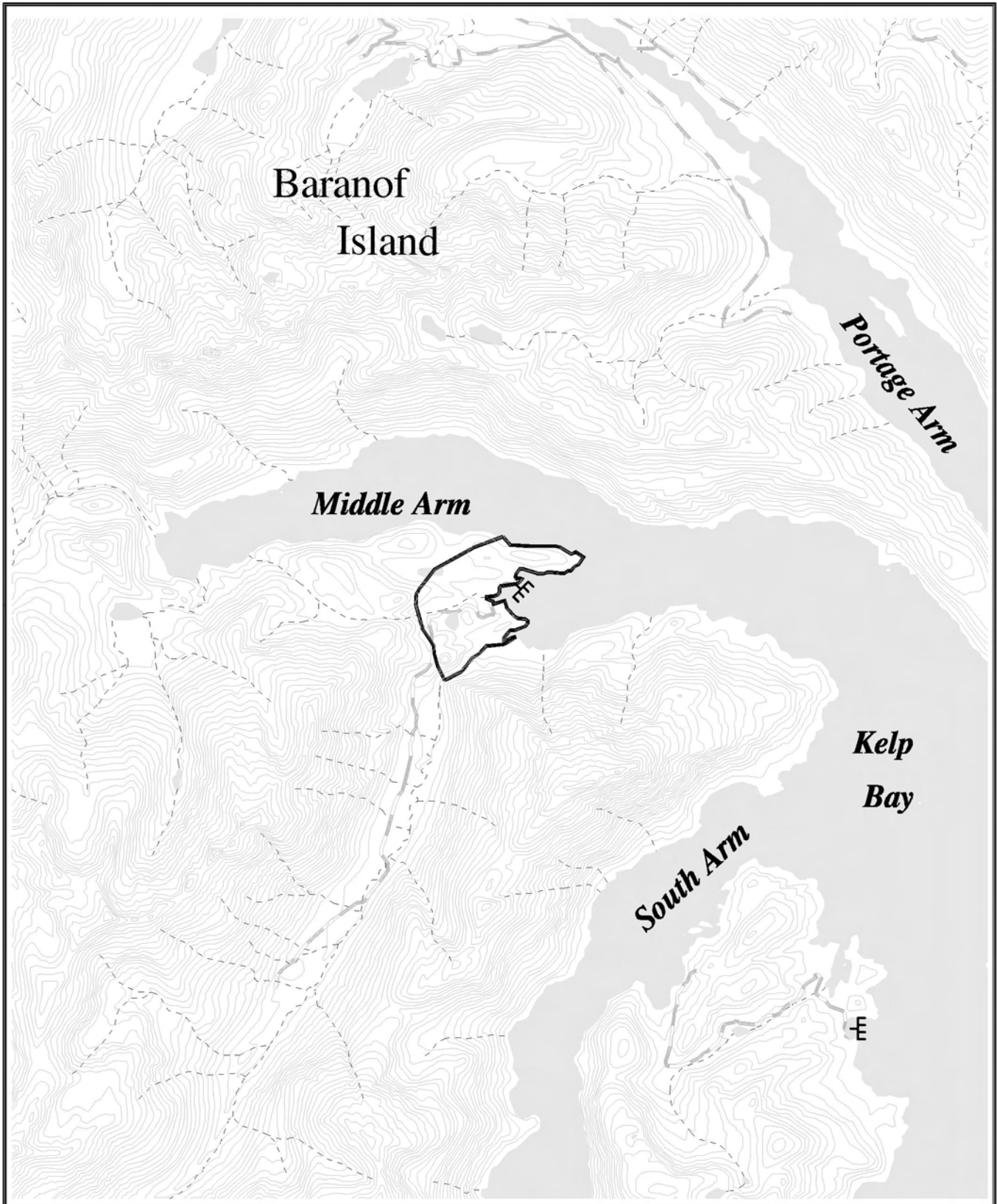
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Bourbon Creek Road Alternative 3	
Type	Fifteen-Percent
Use Area	04-04B
LUD	Modified Landscape
ROS	Roaded Modified, Semi-Primitive Non-Motorized
Acres	346
General Characteristics	Timber was harvested in this area during the 1970's, but much of the old growth forest remains. There is a small tide and grass flat near the mouth of Bourbon Creek.
Historical Use	This area was logged in the 1970s. There was no reported commercial use of this site during 1999-2001.
Access	There is a protected anchorage and it is possible to use a skiff to access the beach during most tide stages.
Facilities	Logging road and marine access point.
Concerns and/or Opportunities	There are interpretive opportunities.
Attractions	There are opportunities to view wildlife, and to hike the beach fringe forest or an old logging road.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Brown bear viewing ○ Bald eagles ○ Vegetation ○ Riparian • Guided activities will not interfere with other forest management activities. • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Northern Southeast Area Plan, Baranof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-04B BOURBON CREEK ROAD



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles



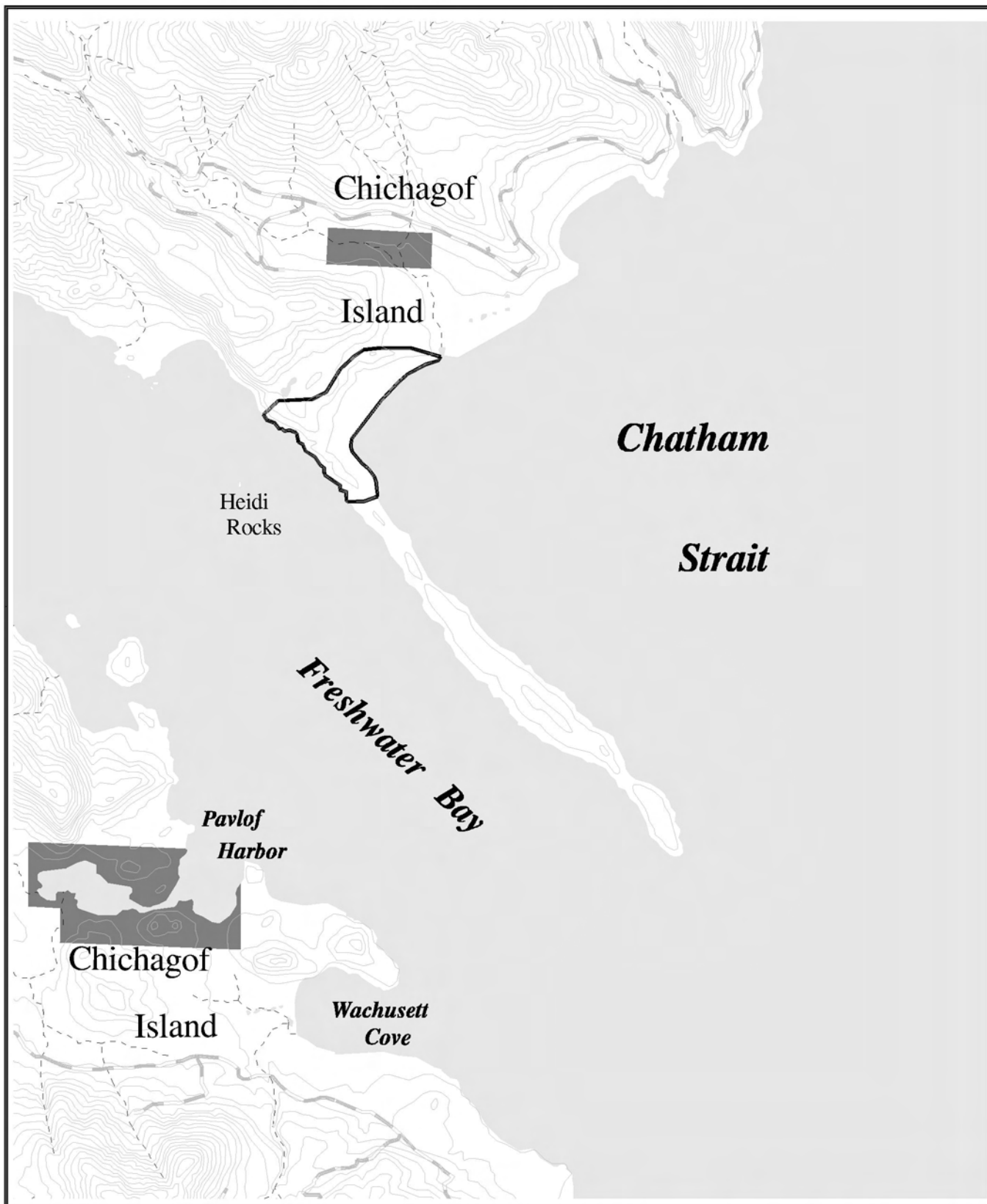
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

<p>Large Group Areas</p> <p>Iyoukeen Peninsula</p> <p>Alternatives 3, 5</p>	
<p>Type</p> <p>Use Area</p> <p>LUD</p> <p>ROS</p> <p>Acres</p>	<p>Fifteen-Percent</p> <p>04-11</p> <p>Old-Growth Habitat.</p> <p>Semi-Primitive Motorized</p> <p>314</p>
General Characteristics	<p>This is a narrow peninsula with excellent views across Chatham Strait, Admiralty Island, and the mountain peaks behind Juneau. There is a good anchorage in Iyoukeen Cove on east side of the peninsula.</p>
Historical Use	<p>There was no reported commercial use of this site during 1999-2001.</p>
Access	<p>It is six miles from Kennel Creek.</p>
Facilities	<p>There are no Forest Service facilities at this location.</p>
Concerns and/or Opportunities	<p>There are seal and/or sea lion haul outs on Heidi Rocks, ½ mile away.</p>
Attractions	<p>It has a scenic setting with wildlife and marine mammal viewing opportunities.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Marine mammals ○ Vegetation ○ Riparian • No large group camping • No consumptive uses by large groups
Other Management Plans	<p>Northern Southeast Area Plan, Chichagof Island Area, Designation Habitat and Harvest</p>

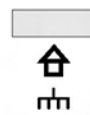
Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 IYOUKEEN PENINSULA



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



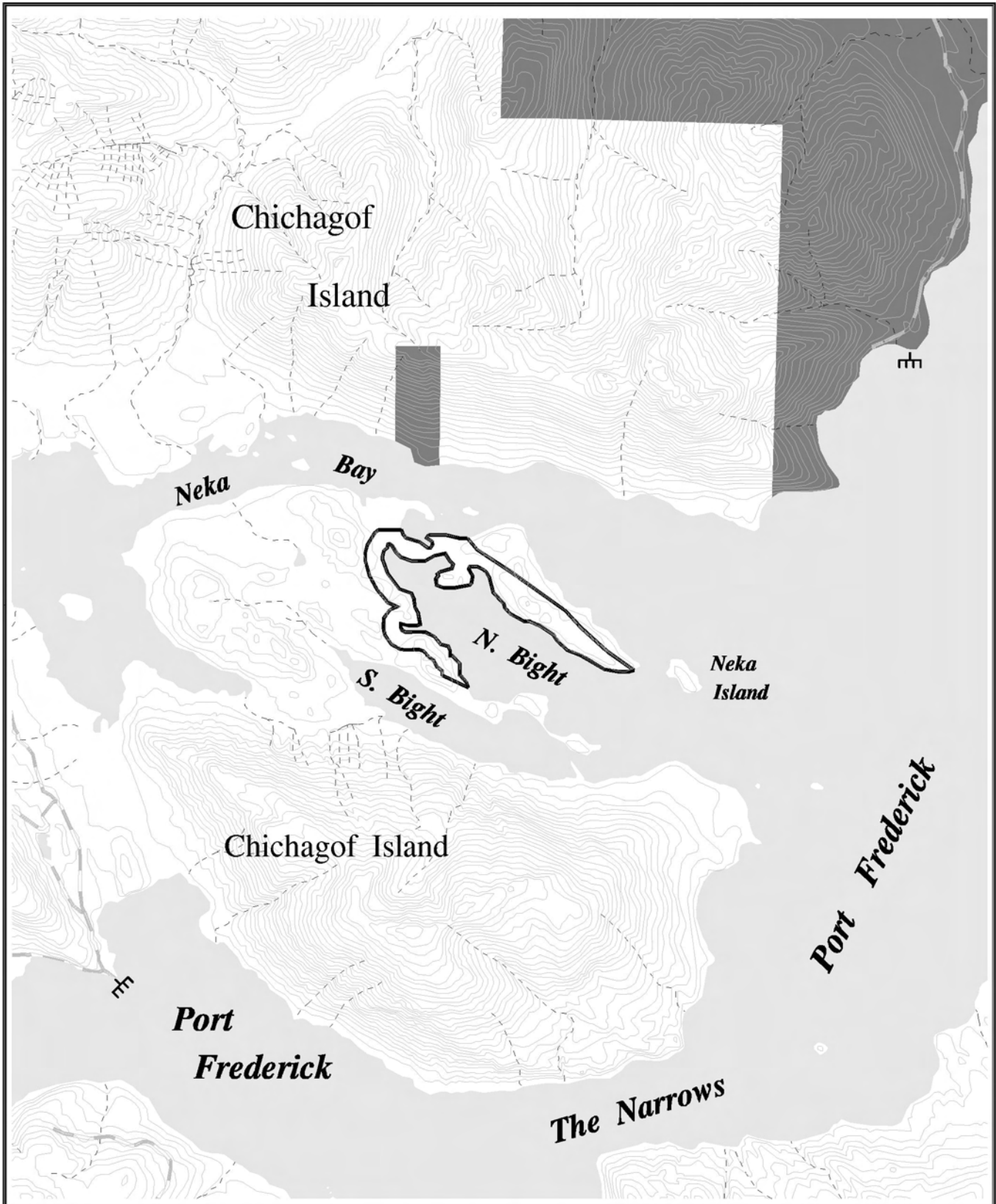
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

<p>Large Group Areas</p> <p>Neka Bay – North Bight</p> <p>Alternatives 3, 5</p>	
Type Use Area LUD ROS Acres	<p>Fifteen-Percent</p> <p>04-11</p> <p>Old-Growth Habitat</p> <p>Semi-Primitive Motorized, Semi-Primitive Non-Motorized, and Roaded Modified</p> <p>347</p>
General Characteristics	This area has a scenic setting in a narrow secluded cove with easy to access shoreline. It has a heavily forested beach fringe. There is a good anchorage at the head of the bight.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	It is ten miles from Hoonah. There is a protected anchorage, and easy beach access by skiff or kayak.
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	There is resource damage from repeated trampling. Possible cultural sites exist. Hoonah residents use this area.
Attractions	Scenic setting, wildlife viewing opportunities
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Riparian ○ Waterfowl—timing restriction from 7/1 to 9/15 for molting birds • Cultural sites will be excluded from guided use. • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Northern Southeast Area Plan, Chichagof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 NEKA BAY NORTH BIGHT



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

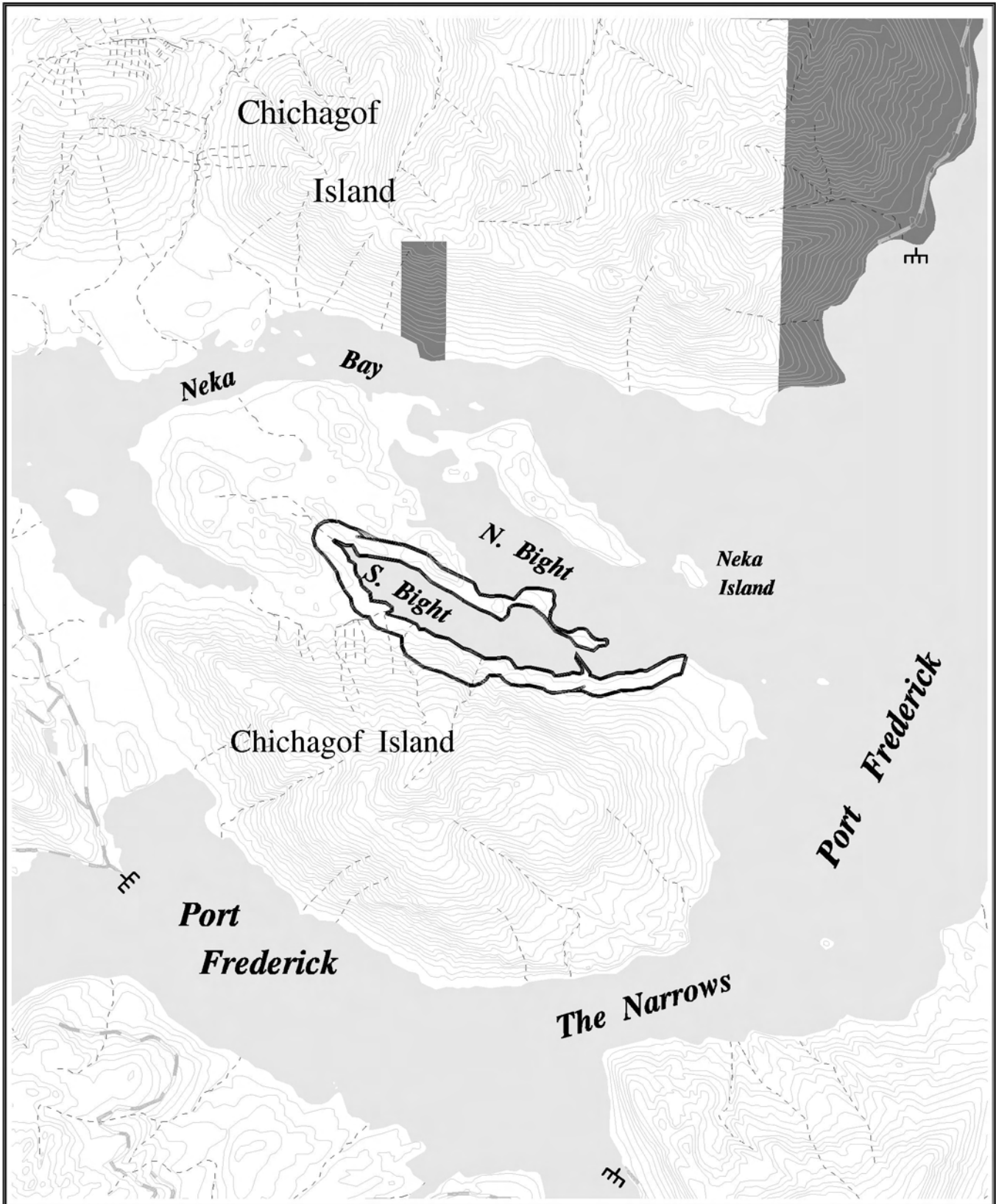
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

<p>Large Group Areas</p> <p>Neka Bay – South Bight</p> <p>Alternative 3, 5</p>	
Type Use Area LUD ROS Acres	<p>Fifteen-Percent</p> <p>04-11</p> <p>Old-Growth Habitat.</p> <p>Semi-Primitive Motorized, Semi-Primitive Non-Motorized, and Roaded Modified</p> <p>457</p>
General Characteristics	It has a scenic setting in a narrow secluded cove with an easily accessible shoreline. The beach fringe is heavily forested. There is a good anchorage at the head of the bight.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	It is ten miles from Hoonah. There is a protected anchorage, and easy beach access by skiff or kayak.
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	There is resource damage from repeated trampling. Potential cultural sites exist. Hoonah residents use this area.
Attractions	Scenic setting, wildlife viewing opportunities
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Riparian • Cultural sites will be excluded from guided use. • No large group camping. • No consumptive uses by large groups.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation Habitat and Harvest

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-11 NEKA BAY SOUTH BIGHT



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |

1 0.5 0 1 2 Miles

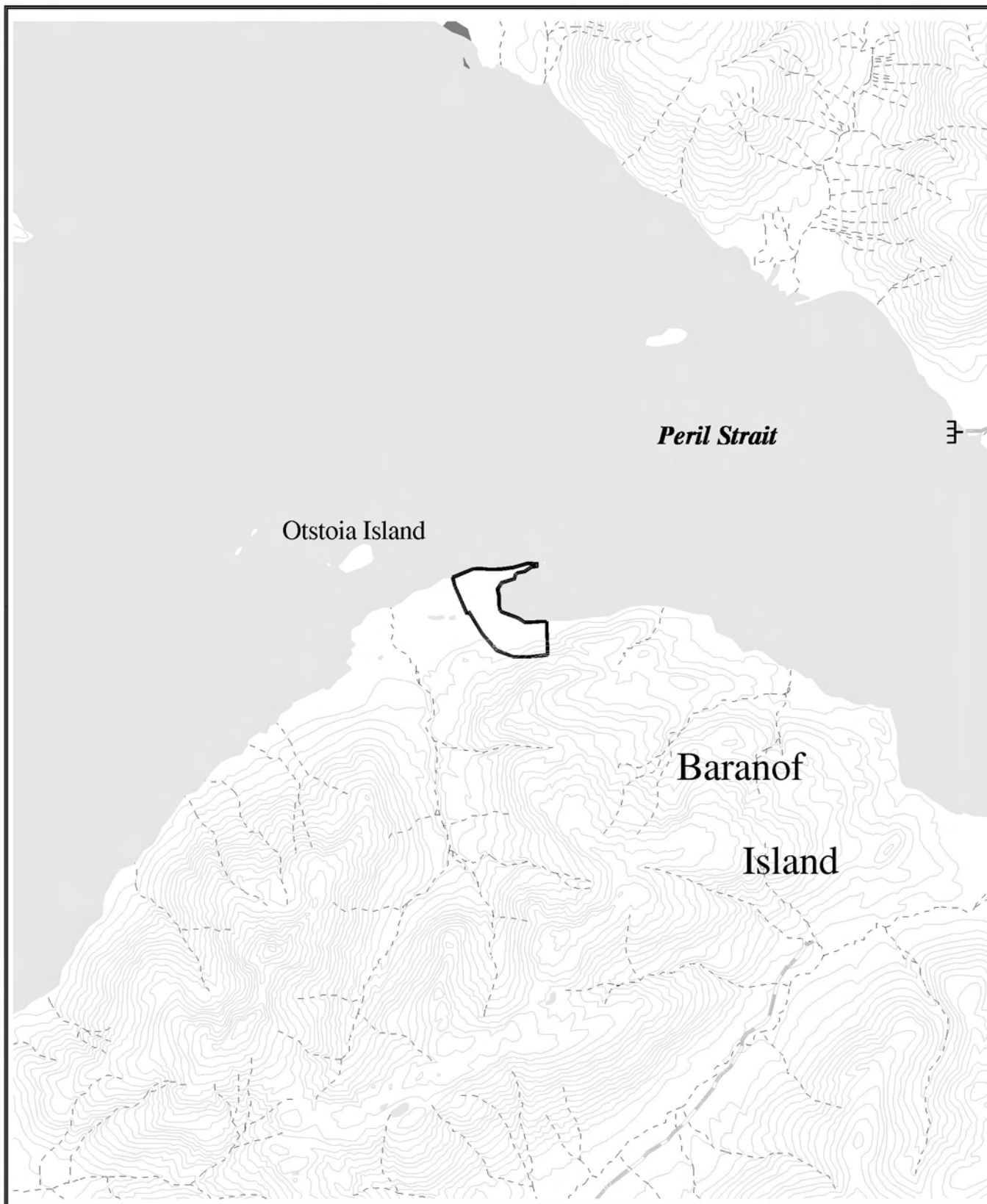
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Nismeni Point Alternatives 3, 5	
Type Use Area LUD ROS Acres	Fifteen-Percent 04-13 Old Growth Habitat Semi-Primitive Motorized 144
General Characteristics	This area is an example of historical second growth. Inland the area becomes open forest and patchy bogs with small ponds. There are a good variety of vegetation types. At low tide there is some intertidal life to explore.
Historical Use	This area was logged in the early 1960s. There was no reported commercial use of this site during 1999-2001.
Access	The anchorage off Peril Strait is protected, except from the easterly direction. It is possible to land a skiff in the small bay to the east of the point; the exact location depends on the tide stage. The very head of the bay has some narrow shallow mudflats at lowest tides.
Facilities	None
Concerns and/or Opportunities	There are interpretive opportunities.
Attractions	This is a historic logging area. There are hiking opportunities inland to open forest and bog areas. It is close to Surgius Narrows and Peril Straits.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Brown bear viewing ○ Vegetation ○ Riparian
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-13 NISMENI POINT



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



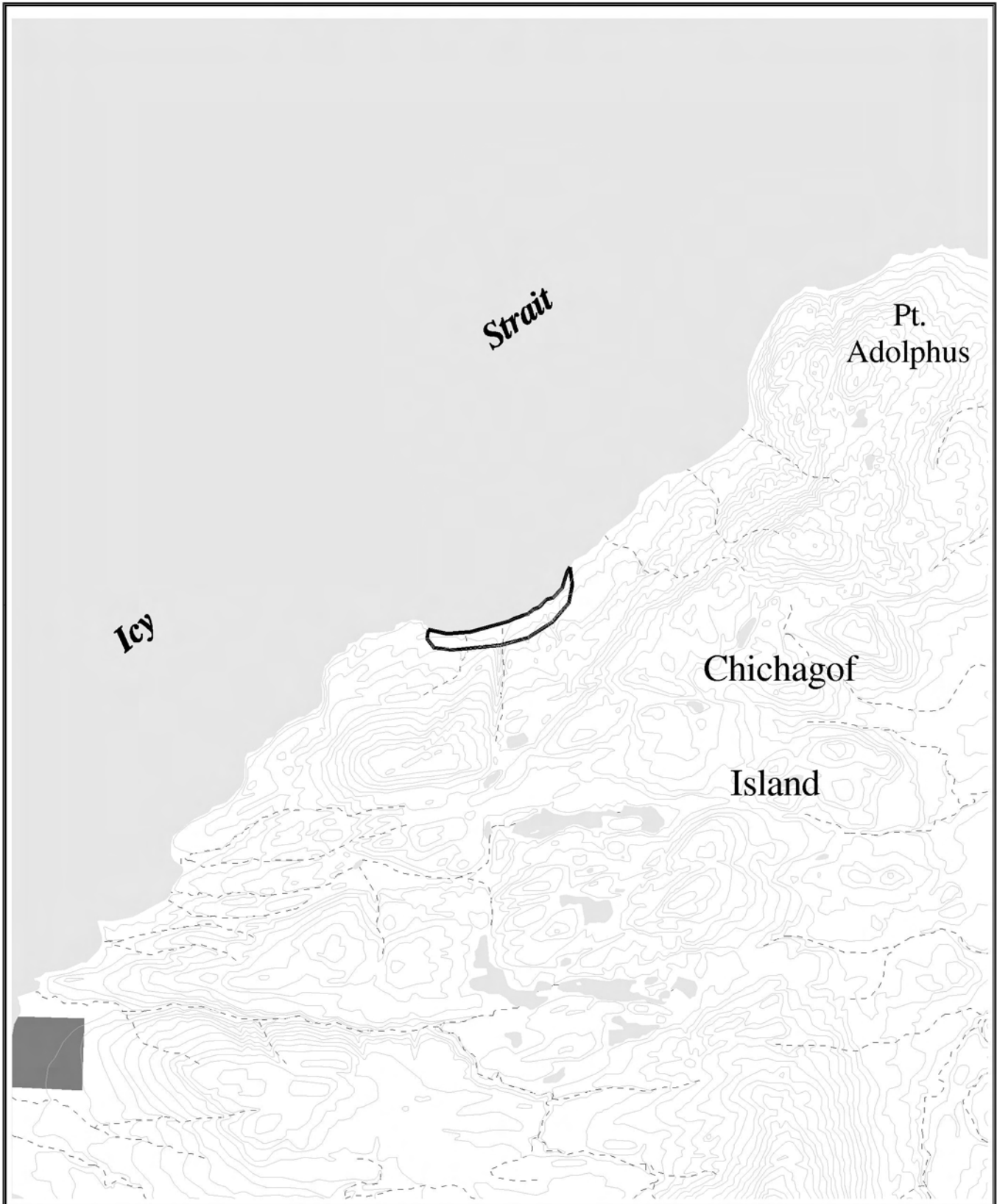
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Damp Marker Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Fifteen-Percent 04-16A LUD II Semi-Primitive Motorized 95
General Characteristics	This area has a narrow uplifted beach along steep mountain slopes. It does not receive much use because the upland beach is mostly impenetrable alder and devils club. The southwestern end of this use area probably has the most potential for a hospitable large group site.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	Good anchorage on calm days. The beach is accessible by small skiff or kayak.
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	This location was identified as a “Desired Area” (previously unvisited) by the participating tour boat operators during the 3/11/99 Sitka meeting – as identified on the Sitka Conservation Society map <u>Areas Desired for Permitted Visitation by Midsized Boat Expedition Operators</u> . This site does not receive much local recreation use. There are seal and/or sea lion haul outs.
Attractions	This area has a scenic setting with views across Icy Strait and Glacier Bay. There are wildlife viewing opportunities, especially sea lions and humpback whales.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Marine mammals ○ Vegetation
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-16A DAMP MARKER



- | | | | | | |
|--|---------------------------|--|--------------------------|--|---------------------------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water Recreation Cabin |
| | Streams | | Wilderness | | Marine Access Point |
| | Existing Road | | Outside of Project Area | | |

1 0.5 0 1 2 Miles

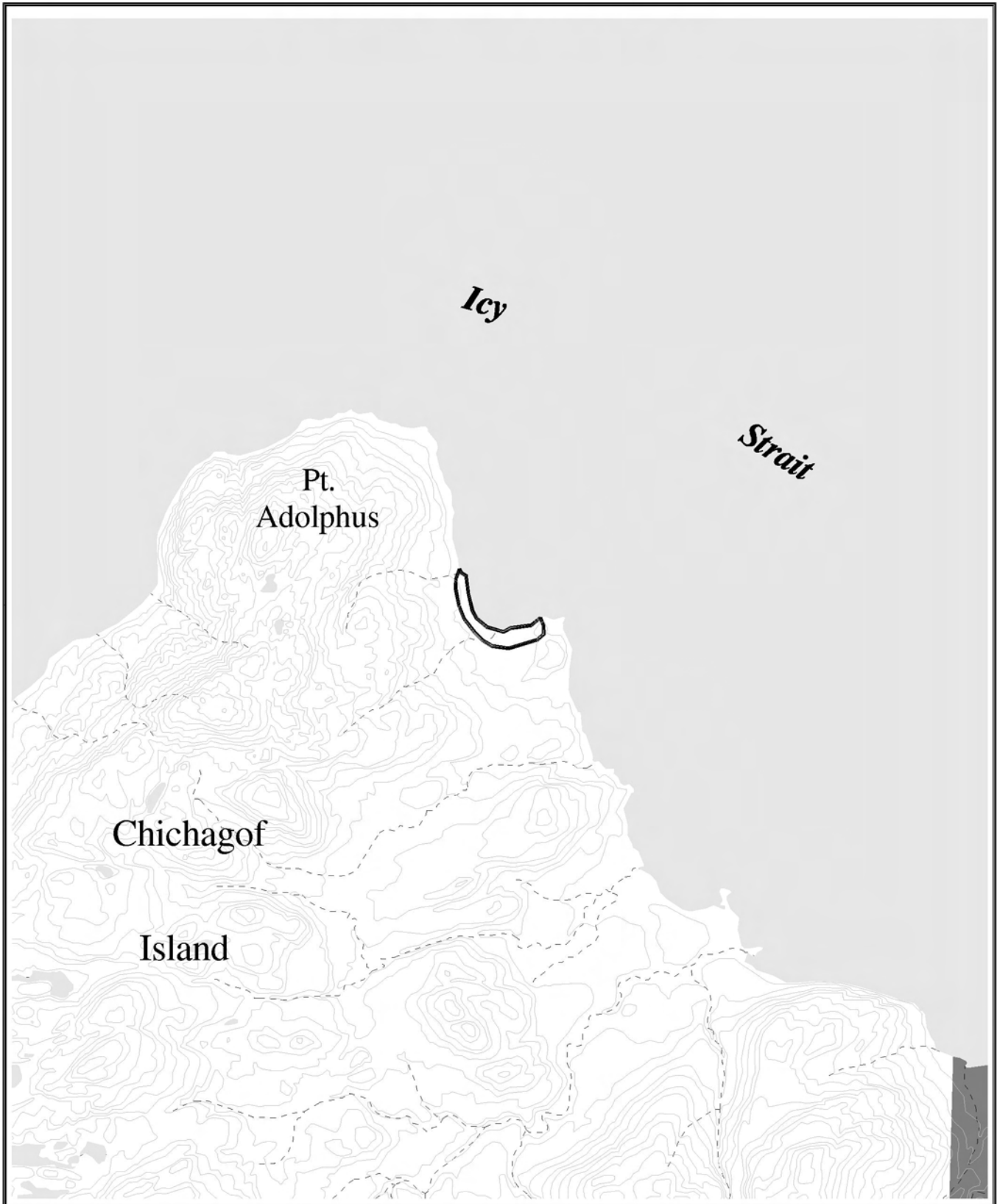
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Pinta Cove Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Fifteen-Percent 04-16A LUD II Semi-Primitive Motorized 57
General Characteristics	<p>This high use area is on the eastern portion of use area 04-16A between Chicken Creek and Point Adolphus. Tour boat operators use this area for kayaking and hiking. Several commercial kayak/camping operators use this area throughout the summer season. The cove receives traffic from kayak transporters, ocean fishing charters, and local mariners.</p>
Historical Use	<p>This site was used by outfitter/guides during 1999-2001.</p>
Access	<p>Pinta Cove provides a fair anchorage for larger boats. The shoreline is normally accessed by small skiff or kayak.</p>
Facilities	<p>A three-sided shelter receives steady use through the summer season from kayakers camping overnight. Pinta Point is a primary campsite that is naturally hardened.</p>
Concerns and/or Opportunities	<p>Icy Strait community residents use the area. There is heavy use by both guided and unguided recreationists.</p>
Attractions	<p>This area features whale and other wildlife viewing, camping, sightseeing, day-use hiking, beach combing, hunting, and an emergency shelter. It currently receives use from mid-size cruise ships. It is a popular recreation place, and people are accustomed to seeing others in this area.</p>
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures <ul style="list-style-type: none"> ○ Bald eagles ○ Brown bear viewing ○ Vegetation ○ Marine mammals ○ Riparian • Large group use will not displace unguided users at the Pinta Cove shelter.
Other Management Plans	<p>Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use</p>

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-16A PINTA COVE



Large Group Area Boundary
 Streams
 Existing Road



Non National Forest Land
 Wilderness
 Outside of Project Area



Salt and Fresh Water
 Recreation Cabin
 Marine Access Point



1 0.5 0 1 2 Miles



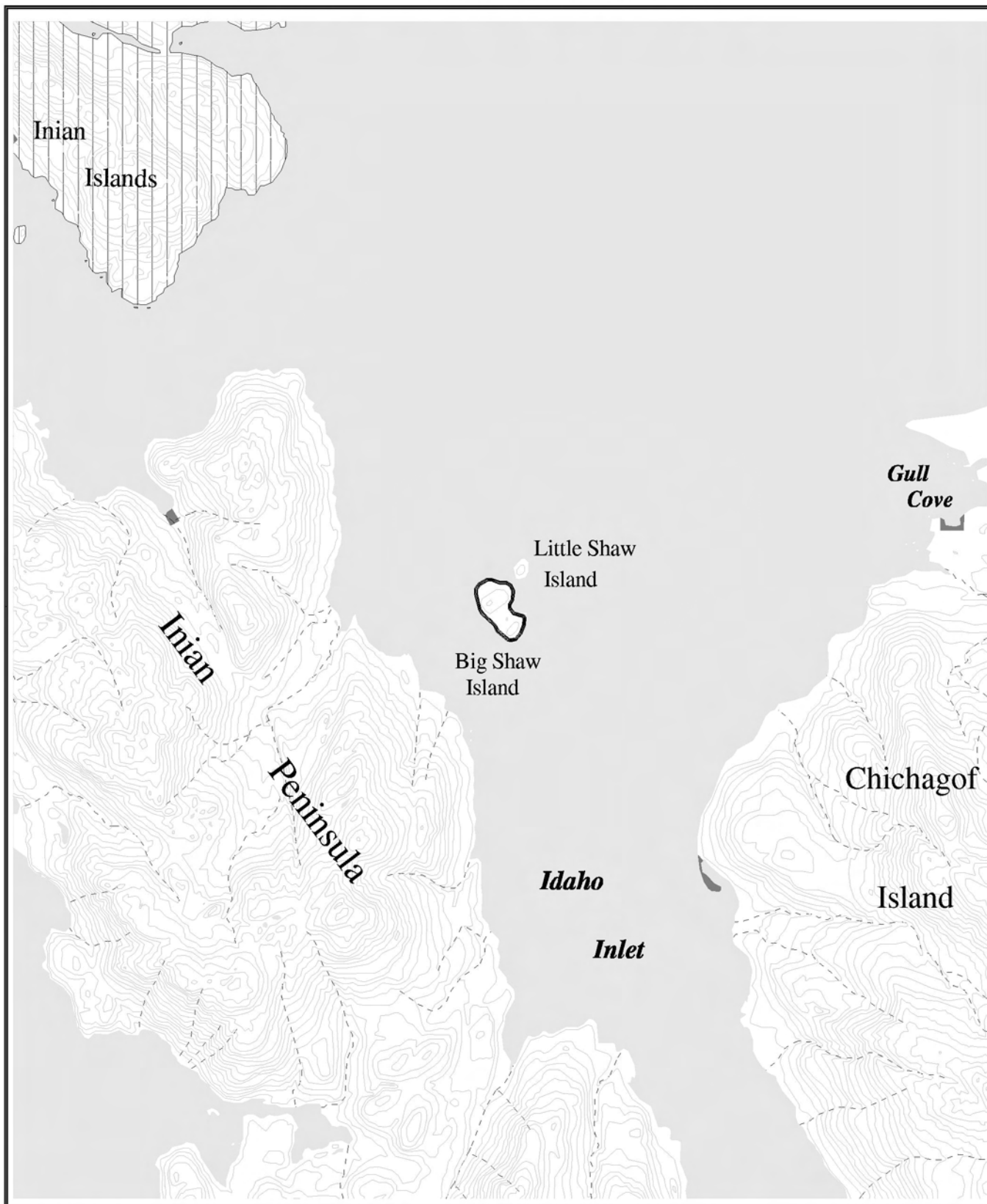
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Area	
Big Shaw Island Alternative 3	
Type	Fifteen-Percent
Use Area	04-16C
LUD	LUD II
ROS	Semi-Primitive Motorized.
Acres	57
General Characteristics	This area features a tiny island with rocky cliffs, tide pools, and old-growth timber. Potential wildlife sightings include whales, sea otter, river otter, seal, sea lions, and sea birds.
Historical Use	There was no reported commercial use of this site during 1999-2001.
Access	A gravel beach on the west side of the island is good for small skiffs and kayaks.
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	Icy Strait residents use this area. There is a local trolling drag between Shaw Island and Fox Creek. There are seal and/or sea lion haul outs.
Attractions	Undeveloped setting with wildlife viewing opportunities, reduced chance of bear encounters
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Vegetation • Outfitter/guide boats must anchor away from trolling drag.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
 Large Group Area
 Use Area 04-16C BIG SHAW ISLAND



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



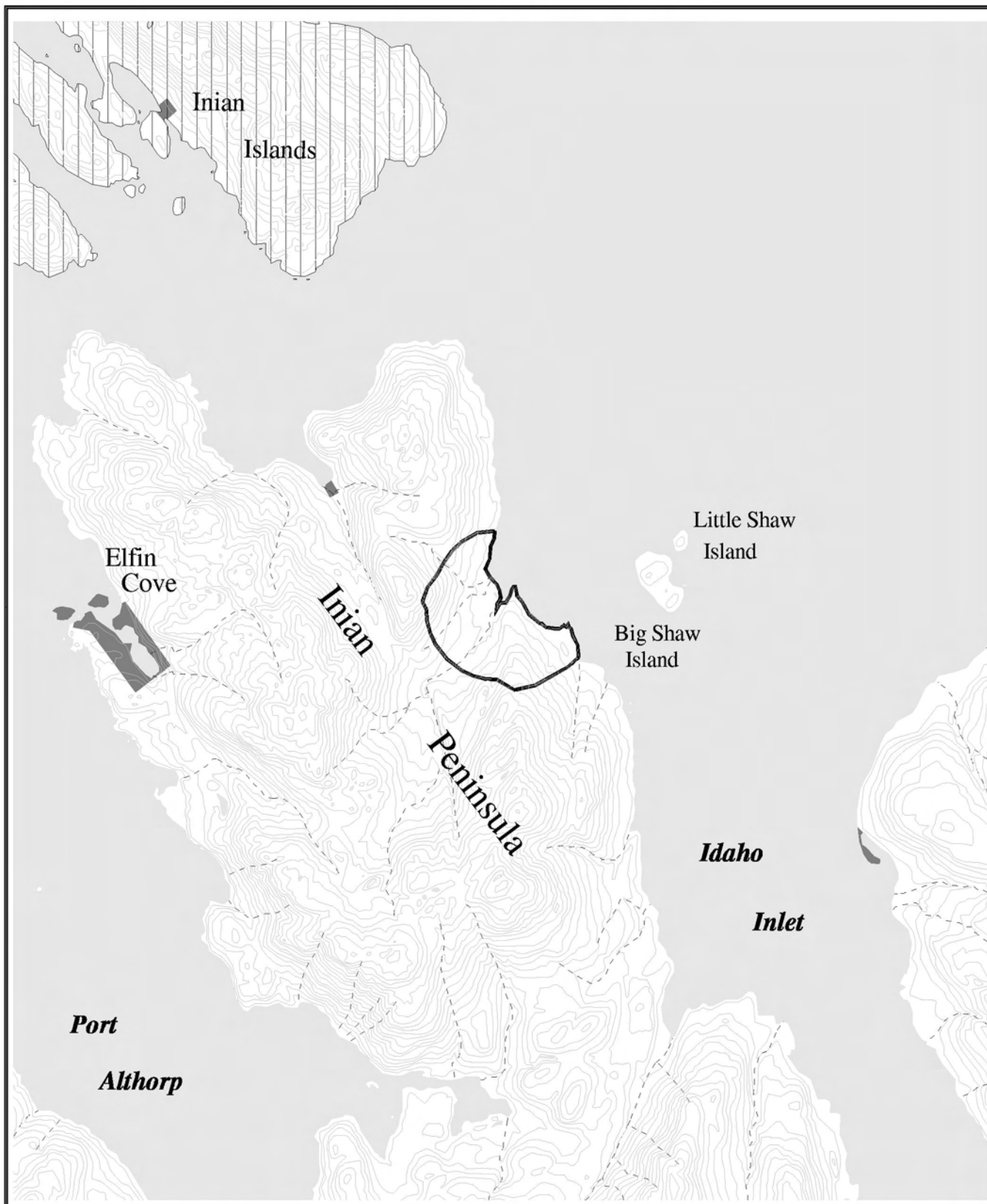
Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas	
Fox Creek Alternatives 3, 4, 5	
Type Use Area LUD ROS Acres	Fifteen-Percent 04-16C LUD II Semi-Primitive Motorized 417
General Characteristics	This area has a scenic setting with a small salmon stream adjacent to a large alluvial fan. There is an open forest understory and a grassy intertidal area.
Historical Use	Outfitter/guides used this area during 1999-2001. Tour boat operators use this site for day use hiking and sightseeing.
Access	A protected anchorage between Fox Creek and Big Shaw Island offers easy access by skiff or kayak to a gravel beach.
Facilities	There are no Forest Service facilities at this location.
Concerns and/or Opportunities	Icy Strait residents use this area. It is a local trolling drag between Shaw Island and Fox Creek. There is potential for human/bear encounters.
Attractions	This area features a scenic setting, wildlife viewing opportunities and easy beach access. It is a good area for hiking and kayaking. It is out of the way and not a popular local recreation place.
Mitigation	<ul style="list-style-type: none"> • See Appendix C for mitigation measures. <ul style="list-style-type: none"> ○ Bald eagles ○ Marine mammals ○ Riparian ○ Vegetation ○ Brown bear viewing • No large group camping. • No consumptive uses by large groups. • Boats must anchor away from trolling drag.
Other Management Plans	Northern Southeast Area Plan (DNR), Chichagof Island Area, Designation General Use

Shoreline Outfitter/Guide FEIS
Large Group Area
Use Area 04-16C FOX CREEK



- | | | | | | |
|--|---------------------------|--|--------------------------|--|----------------------|
| | Large Group Area Boundary | | Non National Forest Land | | Salt and Fresh Water |
| | Streams | | Wilderness | | Recreation Cabin |
| | Existing Road | | Outside of Project Area | | Marine Access Point |



1 0.5 0 1 2 Miles



Mapscale 1:63360

Contour Interval is 100 Feet

Appendix B—Large Group Areas

Large Group Areas Considered but Eliminated

The following list displays the potential large group areas that were considered and eliminated from further consideration. Other areas, such as Port Althorp and Use Areas containing communities, were also eliminated from consideration.

Table B-3. Large Group Areas Considered but Eliminated

Enclaves	Fifteen-Percent Areas	Reason for Elimination
Deep Cove		Not compatible with ROS/LUD.
Sashin		May impact NMFS research facility at the entrance to Sashin Creek.
Lovers Cove		Not compatible with ROS/LUD.
Port Herbert		Not compatible with ROS/LUD.
Cliff Lake		Not compatible with ROS/LUD
	Elovoi	Cultural resource concerns.
	Shoals Point	Cultural resource concerns.
	Mud Bay Road	May conflict with community historic ATV use.
	Sinitisin Cove	May impact Native Allotment
Lauf Island		Island is too small for large group use.
	Thatcher	Cultural resource concerns.
	Kelp Bay-S.Arm	Not compatible with ROS/LUD.
Takatz Islands		Not compatible with ROS/LUD.
	Sadie Lake	Most of trail is on non-national forest land.
	Kadashan Bay	Bay heavily used by the residences of Tenakee Springs.
	Long Bay	Better areas available in this vicinity.
	Coffee Cove	Cultural resource concerns.
	Broad Creek	Cultural resource concerns.
	Goose Cove	Cultural resource concerns.
	Deep Bay	May impact Native allotment
Barlow Cove		Three Special Use cabins and cultural resource concerns.
Hawk Inlet (1)		Poor access due to tide flats.
Hawk Inlet (2)		May impact existing cabins.
Endicott River		May impact known Sensitive plant species.
Slate Cove		Cultural resource concerns.
Sawmill Creek		Cultural resource concerns.
Scow Cove		Poor access with large tide flats and shifting sandbars.
Grizzly Bar		Poor access due to large tide flats.

Large Group Areas—Appendix B

Enclaves	Fifteen-Percent Areas	Reason for Elimination
Davidson Creek		Poor access due to big tide flats.
Slocum Inlet		Poor access due to large tide flats. Existing power line corridor. Limited attractions.
Mist Creek		Existing power line corridor and low-hanging lines directly behind the beach.
Bogert Point		Poor suitability for recreation use.
Sweetheart Creek		May impact unguided users in an area with a terminal fishery that is popular with Juneau anglers.
Gilbert Bay East		Proximity to Sweetheart Creek.
Meigs Peak I, North		Access too exposed. Better sites are nearby.
Meigs Peak II, South		Access too exposed. Better sites are nearby.
Dry Bay		Difficult access due to large tide flats.
Windham Bay I		Poor access, limited anchorage and limited attractions.
Windham Bay II		Cultural resource concerns.
Windham Bay South		Limited attractions. More suitable sites nearby.
Pot Marker		Poor access with large tide flat and rocky approaches.
Sunset Island		Exposed site, rocky shoreline, May disturb sea lion haul out.
Sunset Cove		Limited attractions
Haystack		Not compatible with ROS/LUD.
Little Lagoon		Limited attractions with modified viewshed. Potential marine access point for timber harvest.
Unknown Lagoon		Limited attractions with modified viewshed. Potential marine access point for timber harvest.
Walter Island		Cultural resource concerns.
	Sandborn Canal	Limited attractions.
	Sandborn Canal II	To avoid impacting a known Sensitive plant species.
	Chicken Creek	Poor anchorage and access. May impact recreation and subsistence. USFS cabin and boat ramp planned.
	Neka Bay/Chimney Rock	To avoid impacting eagle nest. Cultural resource concerns.
	Whitestone Harbor	To avoid impacting unguided used by the Hoonah residents for recreation and subsistence. Planned location for a USFS cabin and boat ramp.
	False Bay	To avoid impacts to a popular unguided recreation and subsistence area.
	Freshwater Bay/East Head	Unsafe access due to large tide flats.

Appendix B—Large Group Areas

Enclaves	Fifteen-Percent Areas	Reason for Elimination
	Freshwater Bay/West Head	Unsafe access due to deceptive tide flats.
	Freshwater Bay/Wachusett Cove	May impact a Special Use hunter's cabin as well as unguided use
	Freshwater Bay/Cedar Cove	Limited hiking opportunities. Better areas for use nearby.
	Freshwater Bay/North Head	Unsafe access due to deceptive tide flats.
	Wukuklook Creek	Developed with trail for road access.
Porpoise Islands		Seal haul out.
	Lisianski Inlet Head	Proposed Wild River, and popular recreation and subsistence area for Pelican.
Little Shaw Island		Seal haul out
	Idaho Inlet-Marble Creek	Not compatible with Primitive ROS.
	Idaho Inlet, Trail River	Not compatible with Primitive ROS.
Idaho Inlet		Not compatible with Primitive ROS.
	Port Althorp	Not compatible with Primitive ROS.
	Salt Chuck	Not compatible with Primitive ROS.
Homeshore		Heritage Resource Concerns
Kelp Bay Middle Arm		Wildlife concerns
Crab Bay		Wildlife concerns
West Tenakee (Goose Flats)		Wildlife concerns
Poison Cove		Wildlife concerns
Ushk Bay		Wildlife concerns
	Cosmos Cove	Wildlife concerns
	Saltery Bay	Wildlife concerns
	Seal Bay	Wildlife concerns
	Trap Bay	Wildlife concerns
	Moser	Wildlife concerns
	Nelson Falls	Wildlife concerns
	Patterson Bay	Not compatible with Primitive ROS.
	Patterson Bay North Point	Not compatible with Primitive ROS.
	Douglas Island	Scenic Viewshed LUD can accommodate large group use without special designation.
	Todd Road/Lindenberg Head	Scenic Viewshed LUD can accommodate large group use without special designation.

Large Group Areas—Appendix B

Appendix D

Monitoring

Appendix D

Monitoring

Introduction

Monitoring is gathering information and observing the results of management activities to provide a basis for evaluation. Monitoring in this project is conducted to better understand the interaction of recreation use on forest resources and to ensure that we are maintaining the sustainability of those resources. It also serves as a quality control process for implementing the project. The evaluation of monitoring results for this project will provide a feedback loop to make corrective actions, as needed, to provide resource protection and the desired recreation opportunities.

This monitoring plan includes commercial use permit administration measures and specific resource monitoring requirements. The recreation activities authorized by this project may also be included as part of resource program and Forest Plan monitoring.

Monitoring will occur during Special Use permit preparation and administration, project-specific field inspections, and in annual program and plan reviews of the recreation use resulting from this project. Mitigation and resource concerns identified during monitoring will be addressed through permit administration. Monitoring will continue to ensure that the permit stipulations offer sufficient resource protection.

Monitoring Through Permit Administration

Monitoring assesses whether the project was implemented in accordance with agency approved outfitter/guide activities and practices. This monitoring is done primarily through administrative inspections in the field, as well as inspections of submitted records. Use Area and Large Group Area cards (Appendices A and B) and Mitigation Measures (Appendix C) provide site-specific information and guidance for commercial permit preparation and administration. . The resource protection measures are implemented by incorporating them into the Special Use permits as stipulations and conditions. They are monitored and enforced through the administration of the permits.

Throughout the duration of the permit and as a part of project implementation, the permit administrator may conduct permit and field inspections to verify that the terms and conditions are being met. If negative impacts are occurring to resources, corrective measures are taken. Permit administrators can initiate action to repair resource damage and modify or suspend operations until problems have been corrected. If permit compliance inconsistencies are found, the authorizing officer will require them to be corrected. The authorizing officer may suspend or revoke the permit if inconsistencies are severe or if they are not corrected in a timely manner. This process ensures that project elements and Forest Plan standards and guidelines are implemented as designed.

Appendix D—Monitoring

An annual evaluation will be done at the end of the season for each outfitter/guide permit. This evaluation reviews compliance with the terms and conditions of the permit, public service, and site cleanup. A mid-season review is used to notify the holder of any deficiencies that will need correction before the year-end evaluation. Renewal of a permit and assignment of priority use depends on documentation of satisfactory performance.

All outfitter/guide permit holders are required to submit annual use and location reports that include: number of days per trip, date of trip, Use Area and a map of specific locations used, number of clients taken on the national forest, amount of time spent on the national forest, activities, and access type. If required, operators must submit a freshwater fishing log that contains: total estimated fishing time, type of fish, and number caught, as well as number kept. Actual use reports will be compared to the use that was authorized in the permit.

An outfitter/guide actual use database for all outfitter/guide use in the analysis area will be used to compile and maintain the above information; the database will incorporate actual site use by guide activity. The database will provide a method to identify and assess the actual use against the capacity that has been established for each Use Area in this document. The database will also identify sites receiving higher use and serve as a valuable tool to prioritize areas for additional monitoring for resource impacts and be useful as a measure for future cumulative effects for other projects. Commercial use will be monitored for site-specific impacts as well as overall effectiveness of the mitigation measures.

Project-specific Monitoring

Recreation Use and Special Use Permit Management

Objective: To provide a quality recreation experience on the forest for both commercial and non-commercial users.

Method: Review actual use reports and database and compile and review outfitter/guide and public comments to determine if the recreation use levels and allocations are acceptable or if there are identified conflicts.

Action: Actual use data will be reviewed annually and compared to the commercial use allocation. Commercial use trends, comments, and concerns from the public and from outfitter/guides will be reviewed to identify potential problem areas. Information collected from items listed below will be reviewed. If the quality of recreation experience is not acceptable, use limits and restrictions could be imposed.

- Request input from outfitter/guides on how the recreation experience can be improved for the forest visitor and to identify concerns regarding industry conflicts by means of a voluntary comment sheet.
- District offices collect and compile public comments about recreation use and opportunities.
- Review information from existing non-commercial forest use sources, such as data collected by ADF&G, National Park Service, Alaska Division of Community and Business Development, Forest Service National Recreation Use Survey, cabin use records, and observations from agency personnel conducting field work.
- Operators conducting consumptive activities, such as fishing, hunting, or

Monitoring—Appendix D

collecting, are required to submit harvest reports of the daily take to the Forest Service if specified in their permit.

- Identify trends and potential impacts to the industry generated from comment cards supplied to the outfitter/guides, the public, and through reports generated by SUDS and the actual use database.
- Monitor to determine if Large Group Area use restrictions are adequate to provide the expected recreation experience; if there are sufficient Large Group Areas to meet the demand for large group use; and if Large Group Areas are in the right locations.

Soil, Water, and Vegetation

Objective: Plan and permit commercial recreation use activities to avoid irreversible or serious and adverse effects on soil, vegetation, and water resources.

Method: Apply Forest Service Best Management Practices to commercial recreation use in all Large Group Areas and other areas of high use to protect the streams from non-point sources of pollution and limit soil erosion. Make soil and water field observations in areas receiving high use during permit administration. Soil disturbance thresholds will be interpreted as signs of erosion, changes in hydrological flow, newly exposed rock, newly exposed tree roots and damage over 50% of a travel route or 15% of an area.

Action: Protect water quality and sustain soil productivity from significant impacts by taking corrective action where necessary, such as restricting use or hardening the site to avoid adverse impacts. Outfitter/guides may be required to contribute to construction necessary to prevent excessive damage, or to rehabilitate unacceptable impacts resulting from commercial activities. All activities will be identified in writing and on a map acceptable to the Forest Service for information and monitoring needs, to be submitted with outfitter guide use reports at year-end.

- **Database review for high use levels:** Monitoring for resource concerns will occur by annually reviewing the actual use for areas receiving high use, as displayed in the outfitter/guide database, and through special use permit administration and inspections.

Additional review of impacts if use levels increase to greater than 50% of 1999-2001 average use levels: These areas include Fish Bay, Sadie River, and Windham Bay.

- **Areas with limited access points:** Large Group Areas that are on small islands, and anchorages or land accessibility is limited to a few places include George Islands, Red Cliff Islands and Three Hill Island. Vegetation surveys should establish a baseline measurement within the next 3 years for soil and vegetation conditions. These surveys will be used to monitor impacts of potential future increases in recreation activities. Outfitter guides will be required to report any new trails or signs of "hardening" that result from their activities. Use that exceeds 50% of the average current use from 1999-2001 may require a site visit if the area is considered "high risk" or "moderate risk" for sensitive plants and soils.
- **Large Group Areas of 25 acres or less in size regardless of use level:** These Large Group Areas include Point Coke (22 acres), Port Houghton (10 acres), North Windham Bay (12 acres), Katzechin Falls (7 acres) and Douglas Island (8 acres). Baseline surveys will be required within 3 years to establish the level of soil and plant disturbance for comparison with future monitoring.

Appendix D—Monitoring

- **New permit requests for group camping of more than 20 persons per year:** These requests will require a site visit by a Forest Service botanist or ecologist to determine if sensitive plants or habitats exist in the area of interest. The location of the proposed campsite must be well-identified on a map to facilitate inventory work.
- **Large Group Areas (unhardened) with use levels of up to 10 groups or 250 visitors per year:** These include Neka Bay, Fox Creek and Pinta Cove. Baseline surveys will be required within 3 years to establish the level of soil and plant disturbance for comparison with future monitoring.
- **Large Group Areas (unhardened) with use levels up to 25 groups or 500 visitors per year:** This includes Williams Cove. Baseline surveys will be required within 3 years to establish the level of soil and plant disturbance for comparison with future monitoring.
- **Large Group Areas with rare plant taxa:** These areas include Howard Bay (*Lactuca*, *Sidalcea* and *Eleocharis*), Fanshaw (*Botrychium*), Sullivan Mountain (*Botrychium*), Katzehin Falls (*Eleocharis*), Cant Cove (*Botrychium*) and Damp Marker (*Botrychium*). Baseline surveys will be required within 3 years to establish the level of soil and plant disturbance for comparison with future monitoring.
- **Group Use exceeding 20 persons, with increasing use:** Locations with use of more than 20 persons per year and experiencing outfitter guide use increases of more than 50% from 1999-2001 average use levels will be assessed for the need for a site visit to determine potential habitat and risk to Sensitive plants. Locations affected are: Allan Point, Berners Bay, Brothers Island, Clear River, Deep Cove, Degroff Bay, Donkey Bay, Donkey Creek, Dry Bay, Endicott Arm, Finger Creek, Florence Bay, Ford Arm, Ford's Terror, Fred's Creek, Freshwater Bay, Funter Bay, Gambier Bay, Goose Creek, Goulding Lakes, Gut Bay, Hawk Inlet, Hidden Falls Hatchery, Holkham Bay—SE, Hood Bay, Hoonah Sound-N. Arm, Joe Hill Creek, Kadashan Bay, Kelp Bay, Kelp Bay-S. Arm, King Salmon River, Kritoi Basin, Lake Eva Trail, Last Chance Harbor, Limestone Inlet, Lisianski River, Little Basket Bay, Middle Arm Creek, Mirror Creek, Mole Harbor, Mole River, Mt. Edgecomb Trail, Mud Bay Island, Mud Bay-Kruzof, Neka River, No Name, Bay, North Cape, Patterson Bay, Pirates Cove, Pleasant Island, Port Banks, Port Frederick, Port Houghton, Pybus Bay, Question Mark Cove, Red Bluff Bay, Red Bluff River, Sadie Lake, Saltery River, Sand Bay, Sawmill Creek, Sitkoh Creek, Sitkoh Lake Trail, Snug Cove, Tracy Arm, Ushk Bay, Whale Bay, Whale Bay-Great, Whitewater Bay, and North Windham Bay.

Site reviews for Chaik Bay, Chicken Creek, Eagle Beach, Gilbert Bay, Goose Island, Granite Cove, Greens Creek, Gull Cove, Idaho Inlet, Kelp Bay Basin, Mud Bay-HRD, Mud Bay Island, Mud Bay River, Pinta Cove and Pinta Point, Port Althorp, Pt. Adolphus, Rakovoi, Slocum Inlet, Taigud Islands and Wheeler Creek will be made by the end of the 2006 season.

Wetlands associated with Large Group Areas and other sites with high use will be monitored for disturbance. Mitigation measures that have been implemented will be monitored to assess their effectiveness. Additional protection measures will be implemented if necessary.

Monitoring—Appendix D

Fish Habitat and Riparian Areas

Objective: Ensure sufficient essential fish habitat and riparian habitat are protected and conserved to support sustainable fisheries and other aquatic life, and to promote old-growth and riparian-associated plant and wildlife species that contribute to a healthy ecosystem.

Method: Visually inspect Large Group Areas and other areas receiving high use to ensure impacts to riparian areas are within acceptable levels of vegetative and soil disturbance.

Action: Conduct field reviews during permit administration to determine if appropriate protection measures are adequate for resource protection. Adjust use levels or protection measures if habitat protection is inadequate.

Method: Visually inspect streams and stream banks receiving guided motorized watercraft use during permit administration.

Action: If effects to riparian and spawning habitat become measurable, restrict motorized watercraft.

Fish, Wildlife, and Subsistence Resources

Objective: Ensure that fish and wildlife management objectives are met for consumptive and non-consumptive uses.

Method: Consult with fish and game management agencies annually and share harvest and use records to assess impacts on fish and wildlife populations.

Action: The Forest Service will consult with Alaska Department of Fish and Game, the Alaska Board of Game, Federal Subsistence Board representatives, and local tribal biologists on an annual basis to review the previous year's consumptive use of fish and game resources, including brown bears, as they relate to outfitter/guide use. Consider adjusting seasons, bag limits, or Special Uses restrictions, such as number or location of hunts, if impacts to wildlife, fish, and subsistence resources are not acceptable.

Heritage Resources

Objective: To ensure that cultural resource sites are adequately protected.

Method: Conduct annual field observations during permit administration at the cultural sites in the North Windham Bay, Sand Bay, Todd Road, and George Island Large Group Areas and at other areas receiving high levels of use. The threshold for monitoring or inventory will be when actual use exceeds 50 percent of average current use levels for each Use Area. In addition, each Large Group Area will receive at least one monitoring visit during the anticipated life of this document (i.e. during the next five to seven years).

Use the actual use reports data and cultural site inventories to identify additional areas for monitoring. Each year a random sample of one percent of all commercial shoreline recreation permits, including annual use reports, will be evaluated to determine if a field monitoring visit is required. Monitoring information provided by other resource surveys will also be used to assess the need for further survey or mitigation of impacts.

Resource monitoring for other activities will also be used in determining if thresholds for use are being approached. Monitoring protocols for sensitive plants assess the amount and type of vegetation and soil disturbance an area receives. Both of these impacts are possible early indicators of impacts to areas with heritage resources.

Appendix D—Monitoring

As data is collected, monitoring thresholds may be adjusted accordingly if no effects are noted as a result of use. Changes to thresholds for monitoring would be made in consultation with the Alaska State Historic Preservation Officer, Indian Tribes and others.

Action: If cultural sites are showing signs of unacceptable impacts, guided recreation use in these areas could be limited or restricted, or the site could be hardened to prevent impacts. The Forest Service will continue to consult with local Tribal governments on heritage resource issues in the analysis area as part of the regular consultation process.

Program Monitoring

Some resources are monitored on an annual basis across the national forest as part of regularly scheduled resource program activity. Wilderness, heritage, and botanical resource programs routinely conduct monitoring activities that are not necessarily tied to a specific project action. This monitoring provides a baseline of information from which assessments can be made. Commercial recreation activities authorized by this project may be included as part of that resource program monitoring, where applicable.

Forest Plan Monitoring

The Forest Plan (Chapter 6) contains a forest-wide monitoring and evaluation plan. Some Forest Plan monitoring items are based on the condition of the Tongass National Forest as a whole while others are contingent on forest management activities. Activities authorized under the Shoreline Outfitter/Guide decision may be included as activities considered in the Forest Plan monitoring where applicable.

Appendix C

Mitigation

Appendix C

Mitigation Measures

Introduction

The Forest Service uses many measures to mitigate or prevent negative social and environmental impacts in the planning and implementation of land management activities. These measures were developed from applicable laws and regulations, manual direction, the Forest Plan standards and guidelines, and recommendations from other sources, such as the *Southeast Alaska Unit 4 Brown Bear Management Strategy* and Leave No Trace strategies.

The following is a comprehensive list of mitigation measures that apply to commercial recreation activities for all of the action alternatives. In addition, some site-specific resource concerns and mitigation measures are listed on the Use Area cards in Appendix A and on the Large Group Area Cards in Appendix B. These cards provide site-specific information and guidance for commercial permit preparation and administration. These cards include a map and narrative identifying resource concerns and site-specific mitigation measures.

The mitigation measures listed here and on the cards in Appendix A and Appendix B will be used to prepare and administer outfitter/guide permits. They will be incorporated into the permits as stipulations where applicable. Mitigation measures may be further refined during the monitoring and administration of commercial use authorizations as additional information becomes available.

General Mitigation Through Permit Screening and Preparation

This is done primarily through review of proposed activities and operating plan, and includes stipulations for operations. The resource protection measures are implemented by incorporating both general and site-specific stipulations into the Special Use permits as stipulations. They are enforced through the administration of the permits.

Outfitter/guide permit proposals go through an initial screening process. The proposal passes two levels of screening prior to becoming a formal application. First, the proposal is checked for the following:

- Consistency with federal, state and local laws, regulations and orders;
- Consistency with the forest land and resource management plan;
- Whether the proposal falls within the bounds of the decision for the Shoreline Outfitter/Guide EIS or other applicable environmental analyses, or whether it requires additional NEPA analysis;
- Whether there would be a serious or substantial risk to public health and safety;

Appendix C—Mitigation

- Whether the use would create an exclusive or perpetual right of use or occupancy;
- Whether the use would unreasonably conflict or interfere with administrative use, other scheduled or existing authorized uses, or adjacent land owners;
- If there is outstanding debt to the Forest Service;
- To ensure that use does not involve gambling or provision of sexually oriented commercial services;
- To ensure use does not involve military or paramilitary training/exercises by private organizations or individuals; and,
- To ensure use does not involve disposal of solid waste, radioactive waste, or other hazardous substances.

If the proposal passes the initial screening, it is then checked at the following second level of screening.

- Is the use inconsistent or incompatible with purposes for which lands are managed or with other uses?
- Is the use in the public interest?
- Is the proponent qualified?
- Does the proponent have the technical and financial capability to comply with the terms and conditions of the permit?
- Is the proponent willing to accept the terms and conditions of the permit?

A proposal must pass all criteria in order to become an accepted application. Once the proposed use is determined acceptable, the authorizing officer may choose to issue a special use permit with stipulated terms and conditions.

The following measures are included as stipulations, permit clauses or additional conditions in applicable Outfitter/Guide special use authorizations:

1. Outfitter/Guide activities are required to comply with all applicable federal, state, and local laws, regulations, and standards.
2. Outfitter/Guide use of permit areas is not exclusive and will not preclude public use or access.
3. Outfitter/guide use is not allowed to take precedence over other activities authorized by the Forest Plan. Commercial recreation use may occur in areas of the national forest designated for other uses such as timber harvest or road construction, but outfitter/guide activities shall not interfere with the operations of other permittees, operators, or contractors. Recreation use of marine access points (MAPs, also known as log transfer facilities) and road systems used for timber harvest will be conducted in a manner not to conflict with other uses and to ensure the safety of all users.
4. Commercial outfitter/guide activities are authorized only above the line of mean high tide on National Forest System lands under National Forest special use authorizations. Requests for the use of the tidelands seaward from the line of mean high tide must be directed to the State of Alaska, Division of Lands.
5. Outfitter/guides are required to protect the land, property, and interests of the United States from damage. Permit holders must identify all hazardous conditions on the permit area that would affect forest resources, improvements, or pose a risk of injury to individuals.

Mitigation—Appendix C

6. Outfitter/guides are not allowed to discriminate against any person on the basis of race, color, religion, sex, national origin, age, or disability in offering their services to the public or in their employment practices.
7. Outfitter/guide operations are not authorized to encroach on state, state selected, or private property without prior written permission of the property owner.
8. Leave No Trace methods must be incorporated into outfitter/guide activities. See Region 10 Leave No Trace Action Plan dated November 1, 1999 for additional information.
9. Group size is limited to the applicable ROS standards and guidelines in the Forest Plan (See Forest Plan pp. 4-41 and 4-46 to 4-52). Enclave and Fifteen-Percent large group areas have a maximum group size limit of 75 people at one time. Only one large group will use these areas at a time. Large groups would not allowed to camp or conduct consumptive recreational activities such as hunting, fishing or plant collecting.
10. Outfitter/guides must comply with all Federal Subsistence Board and State of Alaska game and sport fishing regulations, including method and bag limits, and restrictions for open and closed areas. Outfitter/guides must also be in compliance with state sport fishing regulations regarding fishing near any stream structure (such as fish weirs, fish traps, etc.). Outfitter/guide activities are not allowed to interfere with subsistence resource users or disrupt subsistence resource gathering activities.
11. Outfitter/guides conducting consumptive activities, such as fishing, hunting, or collecting, may be asked to submit harvest reports of the daily take to the Forest Service as specified in their permit.
12. New, user-created trails resulting from outfitter guide recreation activity shall be brought to the attention of the Forest Service by the permittee. To meet Soil Quality Standards (Forest Service Manual 2554.03), the Forest Service and the permittee will work together toward planning for trail rehabilitation or construction to eliminate soil erosion or other habitat disturbance if soil damage exceeds a 15 percent threshold. Soil damage is defined as changes in hydrologic flow including erosion, exposure of bare rock, and exposed tree roots over 50% of the trails created by users.
13. Outfitter/Guides and their clients are not allowed to discharge a firearm or any other implement capable of taking human life, causing injury, or damaging property:
 - In or within 150 yards of a residence, building, developed recreation site or occupied area; or
 - Across or on a national forest development road or adjacent body of water, or in any manner or place where any person or property is exposed to injury or damage as a result of discharging a firearm (36 CFR Section 261.10(d)).
14. In addition, there may be other local restrictions on discharging firearms (such as within one mile of campgrounds, etc.) that outfitter/guides and their clients must follow. Such restrictions will be part of the authorized special use permit.
15. Outfitter/guides are not authorized to use public use recreation cabins or their amenities (such as skiffs, firewood, and fire rings) unless specifically authorized on their permit. Low-use recreation cabins may be authorized for commercial use on a case-by-case basis.

Appendix C—Mitigation

16. Campfires may not be built in Wilderness areas unless a firepan is used or unless Leave No Trace methods employed.
17. All food, belongings, and gear brought on-site by guides and their clients, will be stored in such a manner as to not be an attraction to bears and other wildlife.
18. Any necessary revegetation or habitat restoration work shall be done with plants native to the Analysis Area.
19. Collecting plants or plant parts shall not be allowed as a part of outfitter guide permits, except by permit issued by the Forest Service for scientific or educational purposes.
20. In Large Group Areas, a visit will count as one group day no matter what size or configuration of the groups, within established limits for that location.
21. With the exception of use at Large Group Areas, generally, groups of 1-12 people, regardless of how they split into party sizes on shore, would count as one group. Any group with 13-20 people would count as two group days. Any group of 21-40 people would count as three group days. Groups of 41-75 people would count as four group days. Groups larger than 75 people would not be authorized. If groups use more than one Use Area in a day, a group day is counted toward the capacity allocation in each Use Area entered.
22. A group using more than one location within a single Use Area only counts toward one group day.
23. Group day use is by calendar days. An overnight stay by one group counts as two group days.
24. Members of a group consist of the same individuals going ashore on any given calendar day. If new individuals enter a Use Area and join an existing group or form a new group that goes ashore, then additional group days are counted toward the capacity allocation.
25. Outfitter/guides must ensure that their activities in Wilderness areas are conducted in a manner that complements Wilderness management objectives and avoids degradation of wilderness values.
26. The services provided by outfitters and guides should facilitate the use, enjoyment, understanding, and appreciation of the national forest recreation settings.
27. Outfitter/guide actions shall contribute to the partnership with the Forest Service in nurturing and encouraging assistance and support for attaining the objectives of the land use designation, and to assist in increased public understanding and appreciation of the Forest Service's mission and goals.
28. Outfitter/guides are encouraged to provide quality services to their clients. This element is reviewed on an annual basis as part of the performance evaluation.
29. Outfitter/guide Special Uses Authorizations shall be administered in accordance with the direction in Forest Service Manual 2720, Forest Service Handbook 2709.11, and Region 10 supplements. Required stipulations and clauses shall be included in the permit.

Resource Protection Measures

Air

Outfitter/guides will manage their activities to control and minimize air pollution impacts and to ensure that predicted emissions from all pollution sources do not exceed Ambient Air Quality Standards as specified under the Alaska Administrative Code, Title 18, Chapter 50.

Outfitter/guides will cooperate with regulatory authorities to prevent adverse effects of air pollutants and atmospheric deposition on forest ecosystems.

Beach and Estuary Fringe

Outfitter/guides will manage their use of beach and estuary fringe areas to maintain fish and wildlife habitats. People should stay on existing paths and game trails when possible to avoid trampling or damaging habitats. In order to minimize potential impacts to sensitive plant species, outfitter/guides will not establish camps or allow their clients to camp in beach meadows.

Group camping permits shall recommend that minimal trampling be allowed on sandy areas of beach where botrychium ferns and beach grasses may be present, or in wetland habitats. Kayak pullouts and campsites should utilize durable sites such as gravel areas devoid of plant life. One access trail in and out of campsite should be used to minimize ground disturbance.

Requested outfitter guide locations with few anchorages and access will require a site visit by a Forest Service botanist or ecologist to assess the area for Sensitive and rare plants and their habitats, recognizing that impacts at these sites are likely to be concentrated in specific areas. Exact camping or use areas must be identified.

Karst and Cave Resources

Outfitter/guides will protect karst and cave resources as required by the Federal Cave Resources Protection Act (FCRPA). Cave use is not permitted without an approved Cave Protection Plan.

Riparian Management Areas

Riparian Management Areas are areas of special concern for fish, other aquatic resources, and wildlife values. These areas are delineated according to the process group direction in the Riparian Forest-wide Standards and Guidelines. To protect fish habitat and water quality, Forest Plan standards and guidelines for riparian areas are applied to all fish streams, and to non-fish-bearing Class III and Class IV streams within the analysis area. Best Management Practices will be used to minimize the risk of land management activities impairing water quality. Special provisions are specified to protect soil and water quality.

Campsites will be placed at least a minimum distance of 100 feet from all perennial streams, lakes, and other bodies of water, and outside of areas dominated by riparian vegetation. This will be done to mitigate effects on riparian vegetation and water quality of human waste, gray/soapy water disposal, litter, and fuel spills.

Visitors using fishing areas along riparian habitats should use forested areas or the most durable surface to access fishing grounds to prevent trampling and creation of undeveloped trails.

When practical, in-stream travel shall be kept between high and low water marks (the region along a stream bank which is periodically de-watered). This will mitigate potential damaging effects on fish eggs.

Appendix C—Mitigation

Motorized boat use will only be authorized in areas where it will not cause adverse effects on fish and riparian habitat. Riparian management will emphasize stream bank protection and erosion control measures on managed trails to minimize potential sediment sources (BMP 16.4: Trail Construction and Maintenance). These protective measures will apply to all alternatives.

Lower Intertidal and Subtidal Areas

Eelgrass is assumed to be important near-shore habitat for a variety of marine species. Outfitter/guides should avoid repeated boat anchoring in vegetated areas where practicable, to minimize adverse effects on eelgrass and other marine vegetation.

Oil Pollution Prevention

During servicing or refueling of equipment, petroleum products may be spilled and potentially enter a watercourse. Locating service and refueling sites well away from wetlands and stream channels will minimize this risk.

Minor oil spills will be prevented by using good housekeeping techniques including: (1) collecting any used oil, oil filters, and grease tubes; (2) requiring equipment operators to carry absorbent pads; (3) providing containment and cleanup for portable fuel tanks (including hose and nozzle); (4) following approved disposal methods for waste products; and (5) repairing equipment leaks promptly.

Wetlands

Best management practices (BMPs) and forest-wide standards and guidelines will be used for primary mitigation for reducing the effects of recreation use on wetlands.

People should stay on existing paths and game trails to avoid excessive trampling or damaging wetlands, where practical.

If monitoring determines that wetlands have been adversely affected by outfitter/guide activities, use in these areas will be restricted and the areas revegetated or hardened to minimize effects.

Soil and Water

Best management practices and Forest Plan standards and guidelines will be used for primary mitigation. Best management practices for soil protection associated with this project apply to all proposed commercial recreation activities and include the following:

- Wetland identification, evaluation, and protection (BMP 12.5)
- Riparian area designation and protection (BMP 12.6)
- Control of activities under special-use permit (BMP 12.10)
- Sanitary facilities (BMP 12.15)
- Control of solid waste disposal (BMP 12.16)
- Revegetation of disturbed sites (BMP 12.17)
- Road and trail erosion control plan (BMP 14.5)
- Measures to minimize surface erosion (BMP 14.8)
- Drainage control to minimize erosion and sedimentation (BMP 14.9)
- Surface erosion controls at facilities (BMP 14.25)
- Recreation facilities planning and location (BMP 16.1)
- Trail construction and maintenance (BMP 16.4)

When an undeveloped trail starts to become over used and is wider than a one person wide footpath, or new trails become established to avoid the worn out spots on the undeveloped trail, commercial outfitter guides are required to notify the Forest Service.

Mitigation—Appendix C

Outfitter/guide activities shall not result in impacts exceeding soil quality standards. In order to meet soil quality standards (SQS), the acreage of affected soil conditions may not exceed 15 percent of the total acreage within the activity area. Activity areas are defined as the total area of ground surface affected by an activity and include the area surrounding a trail, footpath, picnic site, or other area of concentrated use. Activity areas exclude specified trails, footpaths, or developed sites. If activities and use levels result in unacceptable impacts, corrective action will occur. This may include limiting use and hardening, stabilizing, and revegetating sites.

Areas with unstable soil or hazardous conditions will be avoided.

Bald Eagles

A minimum 330-foot radius non-disturbance zone will be maintained around each identified bald eagle nest tree. Camping is not allowed within the non-disturbance zone. Other guided recreation activities should be minimized within the non-disturbance zones of active nests. Activities shall be conducted to avoid disturbing or harassing eagles. All nest trees are considered active from March 1 to May 31. From June 1 to August 31, trees with nests containing eggs or young, as indicated by observation of eggs, young eagles, or by the presence of adult eagles in nesting activities, will be considered active.

Great Blue Herons, Hawks, and Owls

A minimum 600-foot radius non-disturbance zone will be maintained around each identified great blue heron, hawk, and owl nest tree. Camping is not allowed within the non-disturbance zone of active nests. Other guided recreation activities should be minimized within the non-disturbance zones of active nests. Activities shall be conducted to avoid disturbing or harassing herons, hawks, or owls. All nest trees are considered active from March 1 to July 31. After August 1, trees with nests containing eggs or young, as indicated by observation of eggs, young birds, or by the presence of adult birds in nesting activities, will be considered active. These protection measures for great blue heron, hawk, and owl nests may be lifted if the nest(s) are inactive for two consecutive years.

Northern Goshawk (including the Queen Charlotte goshawk subspecies)

A minimum 600-foot radius non-disturbance zone will be maintained around each identified goshawk nest tree. Camping is not allowed within the non-disturbance zone of active nests. Other guided recreation activities should be minimized within the non-disturbance zones of active nests. Activities shall be conducted to avoid disturbing or harassing goshawks. All nest sites will be considered active from March 15 to August 15. After August 15, sites with nests containing eggs or young, as indicated by observation of eggs, young birds, or by the presence of adult birds in nesting activities, will be considered active. All goshawk sightings shall be reported to the Forest Service.

Peale's Peregrine Falcon

A minimum two-mile radius non-disturbance zone will be maintained around each identified Peale's peregrine falcon nest tree. Camping is not allowed within the non-disturbance zone of active nests. Other guided recreation activities should be minimized within the non-disturbance zones of active nests. Activities shall be conducted to avoid disturbing or harassing falcons. All nest trees will be considered active from April 15 to August 31. After August 31, trees with nests containing eggs or young, as indicated by observation of eggs, young birds, or by the presence of adult birds in nesting activities, will be considered active.

Appendix C—Mitigation

Seabird Rookeries and Waterfowl Concentration Areas

Implementing the following actions will protect the seabird rookeries and waterfowl concentration areas that provide important prey foraging habitat for the American peregrine falcon.

- For permitted outfitter/guide aircraft flights, maintain a constant flight direction and airspeed, and a minimum flight elevation of 1,500 feet for helicopters and fixed-winged aircraft when weather conditions permit. Avoid flying over seabird colonies/rookeries where possible.
- An 820-foot radius non-disturbance zone on upland habitats around seabird colonies and rookeries will be maintained. No camping is permitted within this zone. Other activities shall be conducted to avoid disturbing or harassing the birds.
- Outfitter/guides shall collect and properly dispose of their garbage to prevent gulls from feeding and collecting on it.
- A timing restriction will be in effect from July 1 to September 15 at the Sand Bay and Fowler Creek enclaves, and at the Neka Bay North Bight fifteen percent area. The intent of the timing restriction is to reduce disturbance to molting scoters and other waterfowl.
- Outfitter/guides and their clients are restricted to the east side of Three Hill Island.

Osprey

A minimum 330-foot radius non-disturbance zone will be maintained around each identified osprey nest tree. Camping is not allowed within the non-disturbance zone of active nests. Other guided recreation activities should be minimized within the non-disturbance zones of active nests. Activities shall be conducted to avoid disturbing or harassing ospreys.

Trumpeter Swan

No camping will be allowed within 0.5 mile of known nesting, brood-rearing, and wintering trumpeter swans. Other guided recreation activities will be conducted to minimize disturbing or harassing swans.

Waterfowl and Shorebirds

Guided recreation activities should be minimized within 330 feet of known waterfowl or shorebird concentration and nesting areas. Activities shall be conducted to avoid disturbing or harassing birds. Camping is not allowed within this zone.

Marine Mammals (Steller sea lions, seals, sea otters, dolphins, porpoises, and whales)

Activities will comply with the Code of Conduct provisions in the NMFS *Alaska Marine Mammal Viewing Guidelines* brochure.

- Remain at least 100 yards from marine mammals.
- Time spent observing individual(s) should be limited to a ½-hour.
- Whales should not be encircled or trapped between boats, or between boats and shore.
- If approached by a whale, put the engine in neutral and allow the whale to pass. Boat movement should be from the rear of a whale.
- In addition, operators are required to stay at least 100 yards away from humpback whales.
- ‘Taking’ marine mammals protected under the Marine Mammal Protection Act is prohibited; taking includes harassing, pursuing, or attempting any such activity (16 CFR Part 1532). For example, if a boat approaches a known Steller sea lion haul-out too closely and sea lions or seals leave the haul-out and escape to the sea, the boat operator may be harassing the animals.

Mitigation—Appendix C

- Outfitter/guide groups will not intentionally approach within 100 yards of, or otherwise intentionally disturb, any hauled-out marine mammal.
- Waste oil and fuels will be managed in compliance with all state and federal regulations to prevent pollution impacts to marine mammals.
- The National Marine Fisheries Service (NMFS) requires the following terrestrial, air, and aquatic zones around critical habitat for Steller sea lions (50 CFR Part 226).
- Terrestrial zones extend 3,000 feet landward from the baseline or base point of each major rookery and major haul-out in Alaska.
- Air zones extend 3,000 feet above the terrestrial zone of each major rookery and major haul-out in Alaska, measured vertically from sea level.
- Aquatic zones extend 3,000 feet seaward in state and federally managed waters from the baseline or basepoint of each major rookery and major haul-out in Alaska that is east of 144 degrees west longitude.

Island King Salmon

King salmon populations in King Salmon River and Wheeler Creek on Admiralty Island are distinct genetic stocks. No other naturally occurring island runs of king salmon are known to exist in Southeast Alaska. Because of their island location and small population size, the Forest Plan lists these fish as ‘sensitive’, and it requires protection and maintenance of the populations to prevent listing as threatened or endangered species. The following forest-wide standards and guidelines apply to island run king salmon for this project (see Chapter 4, Forest Plan).

- There is high quality spawning habitat upstream of the grass flats where island king salmon may stay for several days in a short length of stream where they are susceptible to harm. No permits will be issued for activities upstream of the grass flats near the mouth of these streams during the month of July that would negatively affect the viability of these king salmon runs.
- The lower grass flats do not possess quality spawning habitat and king salmon are not likely to spend an extended period of time there. In addition, state sport fishing regulations prohibit the taking of king salmon in all fresh waters within the analysis area. Guided sport fishing may be allowed in King Salmon River and Wheeler Creek within the lower grass flats. Guided sport fishing in these areas would not negatively affect the viability of king salmon.

Brown Bears

Outfitter/guides shall include bear safety education elements to their safety plans. These elements will include field sanitation, basic bear biology and behavior, how to avoid confrontations with bears in the field, viewing distances, and what to do in case of a bear encounter.

Outfitter/guides will not harass or chase bears with motorized land vehicles, boats, or aircraft. Aircraft operations will implement the following best management practices (BMPs) flightseeing/wildlife viewing guidelines.

- All flight operators shall comply with FAA restrictions.
- Consistent with aircraft passenger safety, pilots shall avoid deliberate close overflights of animals for the purpose of viewing.. For fixed wing, 500 feet is the minimum distance for overflights or approaches. For helicopters the minimum distance is 1,500 feet. When on regular flight paths, incidental overflights are allowed.

Appendix C—Mitigation

- Hovering near, herding, harassing, or driving bears or other wildlife in any way is not allowed. If an animal or group of animals shows signs of disturbance, the aircraft is too close.
- Outfitter/guides will use flight paths that avoid known sensitive wildlife areas, including kidding and calving areas, dens, nest sites, haul-outs, rookeries, and seabird colonies, during critical time periods.
- Consistent with aircraft and passenger safety, operators should establish flightseeing routes that will provide regular and consistent aircraft operations, which will encourage habituation and minimal disturbance to wildlife.

Manage food and solid waste according to the following methods.

- Outfitter/guides will segregate and store organic wastes and items, such as cans and jars that are contaminated with organic waste, in a bear-proof container for disposal in an approved disposal site. Freezing organic wastes until disposal is the preferred storage method. Alternatives are: (1) incinerate organic waste and other combustibles in a locally fabricated incinerator meeting ADEC standards for residue; or (2) use garbage grinders with disposal to a sewer system (not appropriate for septic tank systems) to remove organic wastes, while incinerating or temporarily storing (as above) contaminated combustible and non-combustible wastes.
- When storing food and organic wastes outdoors in bear habitat, use sealed bear-proof containers. Do not leave fish or game carcasses near a human use area including a campsite, or other place with high potential for bear/human conflicts.
- Burn all combustibles and pack out all non-combustibles. Do not discard organic material along or near trails.
- Never allow bears access to human foods.
- Baiting and feeding bears and other wild game is prohibited except for trapping furbearers or hunting black bears consistent with state regulations regarding black bear baiting (GMU 1D in the analysis area).

The following are additional guidelines for bear viewing where bears are *not* habituated to people.

- Remain far enough away from the bear(s) so that human presence, if noticed, does not affect the animal's behavior.
- View bears from safe locations that do not make people vulnerable to a surprise approach by a bear.
- Do not approach bears directly.
- Avoid startling bears.
- If seen by a bear, avoid moving. Even minor movements will encourage wary bears to leave the area.
- Never use a motorized vehicle, aircraft, or boat to try getting close to a bear.
- Never run from an approaching bear; it may trigger a prey chase response. When moving away from a bear, do so in a slow, deliberate manner.
- Show respect and courtesy to other bear viewers. Conduct viewing in a way that does not detract from the experience.

Mitigation—Appendix C

- When possible, approach from downwind of bears or areas where bears are likely to be.
- If possible, arrange for travel to and from the viewing site(s) to occur at the same time each day.
- Small groups are less likely to disturb bears and so are more likely to have better viewing. Keep group sizes as small as possible, but keep in mind that there is safety in numbers.
- Keep portions of each day visitor free to allow non-habituated bears a period of use without the stress of having people present.

The following are additional guidelines for bear viewing where bears are habituated to people.

- Primary use of the area will be by bears; human use will be secondary.
- Minimize the size of the viewing site(s) to that necessary to accommodate the group size; limit group size by the space limitations of the viewing site and by acceptance by the bears as indicated by their behavior. Viewing sites are defined as a specific spot in an area used by people to view bears, such as a pad, platform, blind, or tower.
- Concentrate viewing to a few sites to minimize disturbance to bears.
- Do not locate viewing site(s) in areas regularly used by bears; instead, locate viewing site(s) adjacent to these areas.
- Access viewing sites from a single trail.
- Where possible, visually screen the approach and departure of visitors to the viewing site(s) from the bears and make viewers at the site(s) unobtrusive.
- Minimize the number of trips to and from viewing site(s); instruct groups to plan on only one round trip to and from viewing site(s).
- Minimize the number of groups viewing bears in space and time; a larger group size is generally preferable to an increased number of groups.
- If possible, arrange for travel to and from the viewing site(s) to occur at the same time each day.
- Outfitter/guides will be responsible for maintaining control of their clients at all times.
- Guides are encouraged to use aircraft and boats only for transportation to and from designated on-the-ground viewing site(s) and not for flightseeing or sightseeing in the general vicinity.

Human/bear high use zones, such as estuaries and other areas merit special attention. Estuaries are defined in the Forest Plan as, “An ecological system at the mouth of a stream where fresh water and salt water mix, and where salt marshes and intertidal mudflats are present. The landward extent of an estuary is the limit of salt-intolerant vegetation, and the seaward extent is a stream’s delta at low tide.” Estuaries and fish stream areas in human/bear high use zones will be managed on a two-tier basis according to the following definitions, stipulations, and guidelines.

Tier I: From the *Southeast Alaska Unit 4 Brown Bear Management Strategy*: “Areas with consistently good bear habitat with repetitive and frequent human use sufficient to generate immediate management concerns (amount of use may vary by location).” Includes, but not limited to, Lake Eva Estuary on

Appendix C—Mitigation

Baranof Island, and Mud Bay and the head of Idaho Inlet at the Trail River Estuary on Chichagof Island.

- Required stipulations: (a) No campfires, barbeques, or picnics in Tier I locations. (b) No overnight camping in estuary areas or within 100 feet of salmon streams in Tier I locations. (c) Visitors will not be transported into estuaries by airplanes, OHVs, jet boats, or helicopters. Visitors will be transported to drop-off points outside of the estuary where they will walk in to the destination.

Tier II: From the *Southeast Alaska Unit 4 Brown Bear Management Strategy*: “Areas with consistently good bear habitat where human use is not immediately a problem but has the potential to be a problem and is approaching the level of Tier I areas.” Includes, but not limited to, Green’s Creek and Pybus Bay Streams on Admiralty Island, and Red Bluff Bay Streams on Baranof Island.

- Tier I stipulations and guidelines are voluntary in Tier II areas.
- Conditions that may change a Tier II area into a Tier I area include, but are not limited to: (a) increased use by commercial and non-commercial users; (b) change in mode of access, such as from non-motorized to motorized; (c) conflicts with bears; (d) evidence of abuse (for example, littering or making organic material, such as human food scraps, available to bears).

Plants

In order to minimize potential impacts on Sensitive plant species, outfitter/guides will not establish camps or allow their clients to camp in beach meadows.

People should use existing paths and game trails where possible to limit trampling or damaging vegetation or sensitive plant habitats.

Sightings of listed sensitive plants shall be reported to the Forest Service.

Listed sensitive plants shall not be collected. Legitimate scientific or educational entities may collect sensitive listed plants only with a valid collection permit.

Other plants shall not be collected for commercial purposes without a permit.

Sites such as small islands, with limited access points, will have thresholds for use to ensure that there is not unacceptable disturbance of soils and plants (see Monitoring, Appendix D).

Heritage Resources

Heritage sites will be protected through avoidance, mitigation, regulatory enforcement, and monitoring. Items of historical, prehistoric, or paleontological value are protected under various federal laws, including the National Historic Preservation Act; the Antiquities Act of 1906; the Archaeological Resource Protection Act of 1979 and other federal regulations.

If historical, prehistoric, or paleontological objects or sites are discovered during activities under this permit, the permit holder is responsible for assuring that those objects or sites are not disturbed during the course of the activities of the permit holder or the permit holder's clients. This includes digging and disturbing sites, and picking up and removing artifacts from sites.

Mitigation—Appendix C

If any historical, prehistoric, or paleontological objects or sites are located, permit holders are required to immediately report their findings to the Forest Service.

For protection of heritage resources that are eligible for, or listed on the National Register of Historic Places, outfitter/guides will not be allowed to create ground disturbance at these sites. Leave No Trace principles will be incorporated into permitted operations. Any activities requiring ground disturbance or construction would be required to undergo a separate environmental analysis and Section 106 review.

Recreation Resources

Outfitter/guide camps are prohibited within one mile of any Forest Service recreation cabin in the project analysis area unless otherwise authorized.

Site-Specific Mitigation Measures

Wild and Scenic Rivers

Outfitter/guide use on wild and scenic rivers will follow the appropriate Forest Plan and Recreational Opportunity Spectrum (ROS) guidelines for group encounters and group size as shown in Table C-1.

Table C-1. ROS Guidelines for Group Encounters and Group Size for Wild and Scenic Rivers

River Name	Use Area	Designation	ROS*	Encounters allowed within Wild & Scenic Areas	Maximum Group Size
Upper Katzeihin River	01-01	Wild River	P	< 3 group/day	12
			SPNM	< 10 group/day	12
Gilkey River	01-04A	Wild River	P	< 3 group/day	12
King Salmon River	04-09	Wild River	SPM	< 6 group/day	12
Lisianski River	04-15	Wild River	SPNM	< 10 group/day	12
			SPM	< 10 group/day	
Kadashan River	04-12	Scenic River	SPM	< 10 group/day	20
Glacial River	04-04B	Wild River	P	< 3 group/day	12

Source: 2001 Tongass National Forest GIS Layers, National ROS Direction, Forest Plan
 *P=Primitive, SPNM=Semi-Primitive Non-Motorized, SPM=Semi-Primitive Motorized

Appendix C—Mitigation

Seymour Canal Closed Area

(Use Area 04-09)

Outfitter/guide fishing is prohibited in all creeks flowing into Windfall Harbor, Pack Creek, and Swan Cove. The recreational emphasis in this area is bear viewing.

King Salmon River, Wheeler Creek, and Greens Creek (Use Areas 04-09, 04-010A)

No guided fishing is allowed upstream of the grass flats on these streams during the month of July. Outfitter/guide use is prohibited unless specifically authorized. Specific areas of allowed use within these flats will be delineated on an aerial photograph and made a part of the permit.

Admiralty Cove (Use Area 04-08)

Outfitter/guide use is prohibited within one mile of Admiralty Cove Cabin.

Pinta Cove Shelter (Use Area 04-16A)

Outfitter/guide use will not displace unguided users at the Pinta Cove Shelter.

Kennel Creek, Salt Lake Bay, Eight Fathom Bight, False Island, and Corner Bay Docks (Use Areas 04-11, 04-12, 04-13)

These docks are for Forest Service administrative use. Outfitter/guides may use these docks as permitted but they may not leave boats unattended or obstruct administrative use.

Cowee Creek, Sawmill Creek, Sweetheart Lake, and Turner Creek (Use Areas 04-01A, 01-05B, 01-04C)

These areas have high potential for conflict with local users. Outfitter/guides must not displace any unguided users. Outfitter/guides will not conduct activities in these areas on weekends or during state and federal holidays.

Sweetheart Creek (Gilbert Bay) (Use Area 01-05B)

Outfitter/guides must know and be in compliance with state sport fishing regulations regarding fishing near any stream structure (such as fish weirs, fish traps, etc.) on Crescent and Speel Lakes and Outlets, as well as streams draining into Gilbert Bay.

Falls Lake (Use Area 04-01A)

Outfitter/guides shall conduct operations to avoid interfering with the personal use fishery.

Fords Terror (Use Area 01-05E)

Outfitter/guides cannot use a single site for more than two consecutive nights, in order to minimize resource effects. For group sizes larger than six, only two camping sites, the 'Middle T' and the 'North Narrows' will be allowed in order to prevent additional site hardening.

White Sulphur Springs (Use Area 04-15)

Outfitter/guide use will not displace unguided users at White Sulphur Springs Bathhouse.

Mitigation—Appendix C

Mist Cove/Deer Lake Trail (Use Area 04-01B)

Use of the Mist Cove/Deer Lake Trail only to the falls overlook area. Groups must stay on the boardwalk trail at all times, including at the falls. Guided groups may not interfere with NSRAA activities. Groups are limited to 12 people including guides.

Little Port Walter/Sashin Lake Trail (Use Area 04-01B)

Use of Little Port Walter/Sashin Lake Trail is prohibited until the trail is reconstructed, because of unsafe trail conditions and resource damage.

Sitkoh Lake Trail (Use Area 04-13)

Approximately the first 1/8-mile of the trail (from saltwater) traverses through private land. Use of the private land outside the trail corridor easement (including the adjacent portion of Sitkoh Creek) is not permitted.

Basket Bay to Kook Lake (Use Area 04-12)

Approximately the first 1/8-mile of the undeveloped trail (from saltwater) traverses through private land. If proposed access to Kook Lake is via Basket Bay, use of National Forest System land will not be authorized unless outfitter/guides provide proof that the landowner has allowed access across the private land.

Little Basket Bay to Basket Lake (Use Area 04-12)

Approximately the first 1/4 -mile of the undeveloped trail (from saltwater) traverses through private land. Use of the private land outside of the trail corridor easement is not permitted.

Lake Eva (Use Area 04-04A)

Outfitter/guides will not be permitted to fly clients into this lake.

Lake Eva Trail (Use Area 04-04A)

Trail will need to be improved before additional guided use is permitted.

George Island WWII Cannon Trail (Use Area 04-16D)

Trail will need to be improved before additional guided use is permitted.

Nelson Falls Trail (Use Area 04-13)

Trail will need to be hardened before guided use is allowed for large groups.

Sitkoh Lake (Use Area 04-13)

Outfitter/guides will not be permitted to fly clients into this lake.

Port Alexander (Use Area 04-01B)

Guided hunting will not occur within one mile of the community of Port Alexander.

Williams Cove (Use Area 01-05B)

Trail will need to be improved before additional guided use is permitted.

Appendix C—Mitigation



Appendix E

Management Direction

Appendix E

Management Direction

Management direction governing this project comes from the national, regional, and forest levels. Direction becomes increasingly more specific from the national to the project level.

USDA Forest Service Strategic Plan 2000

National Level Direction

The USDA Forest Service Strategic Plan (2000 Revision) provides the mission statement and outlines long-term goals and objectives that set the course and provide guidance for the agency's actions. The Strategic Plan incorporates the priorities of the agency's Natural Resource Agenda, focusing on watershed health and restoration, sustainable forest management, the national forest road system, and recreation.

The following recreation management objectives from the Strategic Plan apply to the Shoreline Outfitter/Guide analysis.

Objective 2.a - Improve the capability of the nation's forests and grasslands to provide diverse, high-quality outdoor recreation opportunities.

- Research methods for estimating recreation capacity and demand using ecological capabilities and social factors.
- Focus recreation management, maintenance, and development activities where demand is currently exceeding or expected to exceed capacity on National Forest System lands.
- Maintain the integrity of roadless areas for dispersed recreation opportunities through implementation of a roadless area conservation policy.
- Manage recreation areas and programs on National Forest System lands to levels compatible with ecosystem sustainability objectives by:
 - working with communities to determine recreation opportunities and priorities,
 - redirecting opportunities and use,
 - improving management of facilities and special places, and
 - increasing environmental education and interpretation.

Objective 2.b - Improve the capability of Wilderness and protected areas to sustain a desired range of benefits and values.

Objective 2.d - Increase accessibility to a diversity of people and members of underserved and low-income populations to the full range of uses, values, products, and services.

Create and institutionalize delivery systems that are more responsive to a diversity of people and members of underserved and low-income populations.

Appendix E—Management Direction

Enhance broader public accessibility through partnerships and contracts with federal, state, and tribal governments and other entities.

Objective 3.a - Better assist in building the capacity of tribal governments, rural communities, and private landowners to adapt to economic, environmental, and social change related to natural resources.

Objective 4.f - Provide appropriate access to National Forest System lands and ensure nondiscrimination in the delivery of all Forest Service programs.

Continue to ensure that National Forest System lands, programs, and facilities are accessible to all Americans.

Forest Service National Recreation Agenda

The Forest Service Recreation Agenda guides programs and activities to meet the recreation goals and objectives of the Strategic Plan. Recreation management on national forests is designed to meet the nation's present and future needs for outdoor recreation in a manner that protects the health, diversity, and productivity of the land.

The Forest Service recognizes the unique nature-based values national forests offer to an increasingly urban society. We also recognize the growing importance of the resource-based travel and tourism industry to provide the means for certain segments of an increasingly urban society to enjoy and appreciate the natural world. The Forest Service encourages travel and tourism opportunities that represent the diversity of existing and potential visitors in collaboration with tourism professionals and state tourism offices.

Recreation planning includes recreation opportunities within the bounds of ecological sustainability. We strive to achieve correct limits of use and balance between competing uses and values through management activities. Recreation programs are managed with an understanding of ecosystem diversity, complexity, and the natural rate of change that is vital to sustaining the amenities and experiences that society desires. The full spectrum of recreation opportunities will be considered.

We will provide access to recreation opportunities. The Forest Service will work closely with other government agencies and landowners to provide for future uses and access.

Recreation planning and implementation must ensure services for all people. It will incorporate the needs of all people, including people with disabilities and underserved groups.

The Forest Service will work closely with other agencies, the private sector, and non-profit groups to enhance and improve visitor services. Planning must be conducted across jurisdictional boundaries.

The Forest Service recognizes the importance of community connections and relationships. Strengthening community connections is vital to provide relevant services and plan for economic development. The Forest Service supports community objectives for building recreational programs, facilities, and services that contribute to local and regional economies and quality of life. The economic health of local communities relies increasingly on the tourism industry. The Forest Service will join with commercial business, non-governmental organizations, trade associations, other government agencies, and educational institutions in forming viable and sustainable nature-based tourism industries.

Management Direction—Appendix E

The Forest Service will need to develop strong business partnerships and relationships with our recreation partners and cooperators to deliver a quality, safe, and responsive recreation program. We will improve business relationships with permit holders by streamlining our processes and providing a more predictable business environment.

We will continue our close relationships with federal, tribal, state, and local governments to be more efficient and to plan for mutually beneficial recreation activities.

Regulations

Federal regulations governing the Forest Service fall primarily under the Code of Federal Regulations, Parks, Forest, and Public Property 36 CFR Chapter 2. Commercial recreation falls under the Special Uses Program regulated under 36 CFR Part 251 – Land Uses.

Manual Direction

Agency direction for administration of the recreation program is provided in the Recreation, Wilderness, and Related Resource Manual (FSM 2300) and the Publicly Managed Recreation Handbook (FSH 2309.23), the Recreation Facilities Handbook (2309.24), and the Trails Management Handbook (2309.18).

Direction for administration of the Special Uses program is provided in the Special Uses Management Manual (FSM 2700) and the Special Uses Handbook (FSH 2709.11).

The ROS Users Guide Handbook provides guidance in using the Recreational Opportunity Spectrum (ROS) for recreation management in land management planning.

Alaska Regional Direction

Alaska Region Strategic Priorities

The Alaska Region Strategic Priorities provide emphasis and guidance in the key program areas of recreation and tourism, communities, Alaska Natives, and organization and employee effectiveness. The Regional Forester's strategic objective for recreation and tourism is to create a future where ecologically sustainable recreation and tourism have become a steady, reliable component of the economies of national forest dependent communities and other communities in Alaska.

Recreation and Tourism Strategic Plan

The Alaska Region Recreation and Tourism Strategic Plan is the Action Plan to implement the Alaska Region Strategic Priorities. The Shoreline Outfitter/Guide analysis is a key task in implementing the Recreation and Tourism Strategic Plan.

Forest Plan Direction

The Tongass Land and Resource Management Plan (1997) sets forth the direction for managing the land and resources of the Tongass National Forest. It is the result of extensive analysis documented in the Tongass Land and Resource Management Plan, Final Environmental Impact Statement (FEIS), and 1997 Record of Decision. The Tongass Land and Resource Management Plan, as amended, is referred to as the Forest Plan in this document. The Shoreline Outfitter/Guide analysis is designed to achieve Forest Plan goals and objectives and move the analysis area toward the desired conditions. The Forest Plan includes forest-wide goals and objectives, and area-specific land use designation (LUD) goals, objectives, and desired future conditions.

Appendix E—Management Direction

Goals and Objectives

Forest-wide goals and objectives applicable to recreation management (see Forest Plan, pp.2-3 through 2-5) include the following:

- Provide diverse opportunities for resource uses that contribute to the local and regional economies of Southeast Alaska.
- Support a wide range of natural/resource employment opportunities within Southeast Alaska's communities.
- Provide a range of recreation opportunities consistent with public demand, emphasizing locally popular recreation places and those important to the tourism industry.
- Manage the Forest's recreation settings in accordance with the Recreation Opportunity Spectrum (ROS) standards and guidelines for each land use designation (LUD).
- Provide for the continuation of subsistence uses by all rural Alaskan residents.
- Evaluate and consider the needs of subsistence users in making project land management decisions.
- Manage designated Wilderness areas to maintain an enduring wilderness resource while providing for public access and uses consistent with the Wilderness Act of 1964 and the Alaska National Interest Lands Conservation Act of 1980 (ANILCA).

Land Use Designations

The Forest Plan uses land use designations (LUDs) to guide management of the Tongass National Forest. Each LUD provides for a unique combination of activities, practices, and uses. The Shoreline Outfitter/Guide analysis area includes 16 LUDs (Figure 1-2). Table E-1 displays the area and Table E-2 displays the miles of shoreline in each LUD. Goals, objectives, and desired future conditions of each LUD that apply to recreation and tourism are provided below and are described in detail in the Forest Plan.

Wilderness LUD

Goals

- Manage all designated Wilderness to maintain an enduring wilderness resource while providing for public access and uses consistent with the Wilderness Act of 1964 and ANILCA.
- Protect and perpetuate natural biophysical and ecological conditions and processes.
- Provide a high degree of remoteness from the sight and sound of humans, and opportunities for solitude and primitive recreation activities consistent with wilderness preservation.

Objectives

- Manage recreation activities to meet the appropriate levels of social encounters, on-site developments, methods of access and visitor impacts indicated for the adopted or existing Recreation Opportunity Spectrum (ROS), as appropriate.
- Provide for public use of the Wilderness in accordance with ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional subsistence use by rural residents.

Management Direction—Appendix E

- Provide trails and primitive facilities that are in harmony with the natural environment and that promote primitive and semi-primitive recreation experiences.

Desired Future Condition

The desired future condition of the Wilderness LUD emphasizes ecological processes and natural conditions that are not measurably affected by past or current human uses or activities. Wilderness users have the opportunity to experience independence, closeness to nature, solitude, and remoteness, and they may pursue activities requiring self-reliance, challenge, and risk. Motorized and mechanized use is limited to the minimum needed for the administration of the Wilderness, access to state and private lands, subsistence uses, and for public access and other uses specifically allowed by ANILCA.

Wilderness National Monument LUD (Admiralty Island)

This LUD applies to portions of Admiralty Island National Monument. Presidential Proclamations of 1978 designated this unit as a National Monument. Designation was due to the superlative combination of significant scientific and historical features.

Goals

The goals are the same as the Wilderness LUD but also include the protection and study of Tlingit cultural resources and other historical resources, the protection and study of brown bear and bald eagle populations, and the preservation of the intact, unique coastal island ecosystem.

Objectives

- Inventory, research, protect, and interpret National Monument resources as directed by Monument designation consistent with wilderness management practices.
- Provide for public use of the wilderness in accordance with ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional subsistence use by rural residents.
- Manage recreation activities to meet appropriate levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the adopted or existing ROS, as appropriate.

Desired Future Condition

The desired future condition of the Wilderness National Monument LUD is the same as the desired condition for Wilderness. The desired condition within the Admiralty Island Wilderness National Monument also includes appropriate research within constraints of Wilderness designation, and contributes to both the purposes of the Wilderness National Monument and improved management of other National Forest System lands.

Non-Wilderness National Monument LUD

This LUD applies to portions of Admiralty Island National Monument.

Goals

- The goals of non-wilderness National Monument LUD are similar to Wilderness National Monument LUD except that limited mining is allowed. Manage Admiralty Island National Monument for public access and uses consistent with the Wilderness Act of 1964, ANILCA, and the Presidential

Appendix E—Management Direction

Proclamation of 1978, which designated the unit as a National Monument because of the superlative combination of significant scientific and historical features.

- Facilitate the development of significant mineral resources located within portions of Admiralty Island, as specified by ANILCA.
- Protect objects of ecological, cultural, geological, historical, pre-historical, and scientific interest, as specified by ANILCA.

Objectives

- Inventory, research, protect, and interpret National Monument resources as directed by National Monument designations.
- Locate and manage trails to direct the public away from mining operations.

Desired Future Condition

Protecting and learning more about the special resources they contain fulfills the Non-Wilderness Monument LUD desired future condition. Appropriate research is encouraged and supported and contributes to both the purposes of the Wilderness National Monuments and improved management of other forest lands. The Non-Wilderness National Monument provides the same natural settings and recreation experiences as the adjacent Wilderness National Monument areas.

Research Natural Area LUD

Goals

- Preserve areas of ecological importance in their natural condition for the purposes of research, monitoring, education, and/or to maintain natural diversity.
- Allow natural physical and biological processes to prevail without human intervention.

Objectives

- Provide opportunities for baseline monitoring of ecological processes and non-manipulative research and observation.
- Maintain the natural, undisturbed character of each area by permitting no permanent facilities and no roads or trails, except for research purposes or as otherwise provided by law; and limiting recreation uses to those that do not affect or alter natural biological processes.

Desired Future Condition

Essentially unmodified environments in which natural ecological processes prevail characterize the desired future condition of the Research Natural Area LUD. They remain undisturbed by human uses or activities, and provide quality opportunities for non-manipulative scientific research, observation, and study.

Special Interest Area LUD

Goal

Provide for the inventory, maintenance, interpretation, and protection of the existing characteristics and attributes of areas with unique cultural, geological, botanical, zoological, recreational, scenic, or other special features.

Objectives

- Provide opportunities for public study, use, and enjoyment of unique natural areas that are suitable to, and do not compromise, the characteristics of each area.

Management Direction—Appendix E

- Allow only facilities and recreation developments that contribute to the interpretation of natural features or provide for compatible uses, and that blend with the natural setting.
- Provide for existing ROS opportunities and activities unless public use is specially restricted for the protection of other resources.

Desired Future Condition

Generally unmodified environments in which unique natural features are preserved characterize the desired future condition of the Special Interest Area LUD. They remain largely undisturbed by human uses or activities, except for localized interpretive purposes and, in some cases, recreation developments, and provide quality opportunities for public study, use and enjoyment.

Remote Recreation LUD

Goals

- Provide extensive, unmodified natural settings for primitive types of recreation and tourism.
- Provide opportunities for independence, closeness to nature, and self-reliance in environments offering a high degree of challenge and risk.
- Minimize the effects of human uses, including subsistence use, so that there is no permanent or long-lasting evidence.

Objectives

- Manage recreation and tourism use and activities to meet the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the Primitive ROS class.
- Provide trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation experiences.

Desired Future Condition

For the Remote Recreation LUD extensive, unmodified natural environments characterize the desired future condition. Users have the opportunity to experience independence, closeness to nature, solitude, and remoteness, and may pursue activities requiring self-reliance in an environment that offers a high degree of challenge and risk. Interactions between users are infrequent. Motorized access is limited to traditional means: boats, aircraft, and snowmobiles. Facilities and structures are minimal and rustic in appearance.

Old-Growth Habitat LUD

Goal

Maintain areas of old-growth forests and their associated natural ecological processes to provide habitat for old-growth associated resources.

Objective

To the extent feasible, limit roads, facilities, and permitted uses to those compatible with old-growth forest habitat management objectives.

Desired Future Condition

For the Old-growth Habitat Land Use Designation, the desired future condition is for all forested areas to attain old-growth forest characteristics and provide a diversity of old-growth habitat types, associated species, and ecological processes.

Appendix E—Management Direction

Semi-Remote Recreation LUD

Goals

- Provide predominantly natural or natural-appearing settings for semi-primitive types of recreation and tourism and for occasional enclaves of concentrated recreation and tourism facilities.
- Provide opportunities for a moderate degree of independence, closeness to nature, and self-reliance in environments requiring challenging motorized or non-motorized forms of transportation.

Objectives

- Manage recreation and tourism use and activities to meet the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the Semi-primitive ROS classes. Enclaves of concentrated recreation and tourism developments within the LUD or management activities in an adjacent LUD may cause the ROS setting to become Rural.
- Permit small-scale, rustic recreation and tourism facilities, and occasional enclaves of concentrated recreation and tourism facilities.

Desired Future Condition

Generally an unmodified natural environment characterizes the desired future condition of the Semi-Remote Recreation LUD. Users have the opportunity to experience a moderate degree of independence, closeness to nature, solitude and remoteness, with some areas offering motorized opportunities and others non-motorized opportunities (except for the traditional uses of boats, aircraft, and snow machines). Interactions between users are infrequent. Motorized access is limited to traditional means: boats, aircraft, and snow machines. Facilities and structures may be minimal or occasionally may be larger in scale, but will be rustic in appearance, or in harmony with the natural setting.

Land Use Designation II (LUD II)

Goal

Manage these areas in a roadless state to retain their wildland character.

Objective

Manage recreation and tourism use and activities to meet the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated by the Primitive and Semi-primitive ROS classes. Apply the LUD II direction from the Forest Plan, which is summarized as follows:

- Permit boats, aircraft, and snow machines, unless such uses become excessive,
- Permit primitive recreational facilities, and
- Major concentrated recreation facilities will generally be excluded.

Desired Future Condition

The desired future condition of the LUD II Land Use Designation is characterized by extensive, generally unmodified natural environments, and retaining their wildland character. Users have the opportunity to experience a high-to-moderate degree of independence, closeness to nature, solitude, and remoteness, and may pursue activities requiring self-reliance, challenge, and risk. Interactions between users are infrequent. Recreation facilities and structures are primitive.

Management Direction—Appendix E

Wild River LUD

Goals

- Maintain, enhance, and protect the free-flowing character and outstandingly remarkable values of rivers and river segments designated as Wild Rivers and included in the National Wild and Scenic Rivers System.
- Maintain Wild Rivers in a natural, free flowing, unmodified condition, and provide recreation and tourism opportunities affording a high degree of independence, closeness to nature, and self-reliance.

Objective

Manage recreation and tourism use and activities to meet the levels of social encounters on-site developments, methods of access, and visitor impacts indicated for the Primitive or Semi-primitive ROS classes.

Desired Future Condition

Wild Rivers and river segments are in a natural, free flowing, and undisturbed condition. Recreation users have the opportunity for primitive and semi-primitive experiences, solitude, and remoteness in a natural setting. Interactions between users are infrequent and evidence of human activities is minimal. Facilities and structures are rustic in appearance and promote primitive recreation and tourism experiences.

Experimental Forest LUD

Goal

Provide for long-term opportunities for forest research and demonstration essential to managing forest resources.

Objective

Roads and trails will generally complement research and interpretation. Allow facilities necessary for ongoing research, as specified in the experimental forest's development plan.

Desired Future Condition

The desired future condition of the Experimental Forest LUD is ongoing research to provide useful information for forest management. Non-research types of activities and uses may be compatible, and do not interfere with research or demonstration objectives.

Scenic Viewshed LUD

Goals

- Provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments as seen from visual priority travel routes and use areas.
- Recognize the scenic values of suitable timber lands viewed from selected popular roads, trails, water travel routes, recreation sites, bays and anchorages, and to modify timber harvest practices accordingly.

Objectives

- Provide a spectrum of recreation and tourism opportunities consistent with the capabilities of this LUD. Semi-primitive to roaded experiences may be offered.
- Design roads and trails to be compatible with the characteristic landscape.

Appendix E—Management Direction

Desired Future Condition

The desired future condition of the Scenic Viewshed LUD is characterized by a natural-appearing landscape as viewed by users of visual priority travel routes and use areas. Recreation and tourism opportunities in a range of settings are available. A variety of successional stages providing wildlife habitat occur, although late successional stages predominate.

Modified Landscape LUD

Goal

Provide a sustained yield of timber and a mix of resource activities while minimizing the visibility of developments in the foreground distance zone. Recognize the scenic values of suitable timber lands viewed from identified popular roads, trails, marine travel routes, recreation sites, bays, and anchorages, and modify timber harvest practices accordingly.

Objective

Provide a spectrum of recreation and tourism opportunities consistent with the capabilities of this LUD. Semi-primitive to roaded experiences may be offered. Avoid changes to semi-primitive non-motorized settings when feasible.

Desired Future Condition

The desired future condition of the Modified Landscape LUD is characterized by a somewhat modified landscape, but emphasizes scenic quality in foreground distance zones. Recreation opportunities associated with natural-appearing to modified settings are available. A variety of successional stages provide a range of wildlife habitat conditions.

Timber Production LUD

Goal

The emphasis of this LUD is timber production and there are no goals specifically pertaining to the management of recreation.

Objectives

- Provide a spectrum of recreation and tourism opportunities consistent with the capabilities of this LUD.
- Manage recreation and tourism use to be compatible with timber production objectives.
- Manage changed recreation settings in accordance with the appropriate ROS class.

Desired Future Condition

The desired future condition of the Timber Production LUD is characterized by a sustained yield of timber, healthy tree stands in a balanced mix of age classes from young stands to trees of harvestable age, and a road system providing access for timber management as well as recreation, hunting and fishing, and other public uses. Recreation opportunities associated with roaded settings from semi-primitive to roaded modified, are available. Wildlife habitats are predominantly in the early and middle successional stages.

Minerals LUD

Goal

Mineral exploration and development is the focus of this LUD, which is an overlay on existing LUDs. There are no goals specific to recreation management.

Management Direction—Appendix E

Objectives

- Authorize special uses that will not substantially conflict with present or anticipated mineral-related activities.
- Manage recreation settings and opportunities to be as compatible as possible with the LUD.

Desired Future Condition

During mining operations, mining activities are limited to the area necessary for their efficient, economic, and orderly development. Mining is carried out so that any effects on other resources are minimized to the extent feasible, and all minimum legal resource protection requirements are met. Other resource uses and activities in the area do not conflict with mining operations. After the completion of mining, affected areas are rehabilitated and, in most cases, the area once again provides the settings and opportunities of the original Land Use Designation.

Transportation and Utility System Corridor LUD

Goal

This LUD is an overlay on the original LUD, and provides for the planning and development of future major public Transportation and Utility Systems, including those identified by the State of Alaska and the Alaska Energy Authority, Department of Community and Economic Development.

Objectives

- Manage other activities to be compatible with present or future major public transportation and utility systems. These include highways, powerlines of 66kV or greater, and pipelines of 10 inches diameter and greater. Once these facilities are constructed, this LUD designation applies.
- Transportation and utility corridors may dominate the foreground, mitigations should be considered.
- Allow special uses and facilities not related to transportation or utility systems, if compatible with present or future systems.

Desired Future Condition

Transportation and Utility Systems are constructed in an efficient and economic manner, and have been designed to be compatible with the adjacent Land Use Designation to the maximum extent feasible. Land impacts are minimized while providing for safe, efficient facilities. Effects on other resources have been recognized and resource protection has been provided. Other resource uses and activities in the area do no conflict with utility operations. State and Federal highways and reservoirs offer new developed recreation opportunities, as appropriate. Once a transportation or utility feature is constructed, this LUD and its prescriptions apply to the landscape.

Forest Plan Standards and Guidelines

Standards and guidelines for the management of the recreation resource are specified to achieve the objectives and goals of the LUD (Forest Plan, 1997; Chapter 3). There are also standards and guidelines that apply across the Forest and all LUDs (Forest Plan, 1997; Chapter 4). The standards and guidelines that apply to the Shoreline Outfitter/Guide Analysis are summarized in Chapter 2 of this document under Items Common To All Action Alternatives.

Appendix E—Management Direction

Table E-1. Area (Acres) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area

Use Area	Experimental Forest	LUD II	Modified Landscape	Non-Wilderness Monument	Timber Production	Old Growth	Research Natural Area	Remote Recreation	Special Interest
01-01	0	0	563	0	0	0	0	1,977	0
01-02	0	0	2,322	0	0	0	0	0	0
01-03	0	0	2,075	0	0	3,768	0	0	0
01-04A	0	10,919	5,347	0	0	2,813	0	10,628	0
01-04B	0	0	0	0	0	310	0	0	0
01-04C	0	0	0	0	0	962	0	73	0
01-04D	0	0	0	0	148	56	0	0	0
01-05A	0	0	0	0	0	2,952	920	0	0
01-05B	0	0	1,633	0	2,244	4,062	0	3,782	0
01-05C	0	0	0	0	1,528	13,484	0	0	0
01-05D	0	0	0	0	0	0	0	0	0
01-05E	0	0	0	0	0	0	0	0	0
04-01A	0	0	0	0	0	0	0	6,051	0
04-01B	0	0	0	0	0	0	0	11,931	0
04-02A	0	0	573	0	0	4,143	0	0	0
04-02B	0	0	0	0	0	0	0	18,110	0
04-03	0	0	4,145	0	5,128	12,673	0	206	10,905
04-04A	0	0	20	0	9,181	2,878	0	0	0
04-04B	0	0	3,496	0	4,026	9,187	0	5,812	0
04-04C	0	0	0	0	0	0	0	922	0
04-05	0	0	0	0	0	0	0	0	0
04-06A	0	0	0	0	0	0	0	0	0
04-06B	0	0	0	0	19	0	0	0	0
04-07	0	0	0	0	0	0	0	0	28
04-08	420	0	0	0	0	0	0	0	0
04-09	0	0	0	0	0	0	0	0	0
04-10A	0	0	0	308	0	0	0	0	0
04-10B	0	0	0	278	0	0	0	0	0
04-11	0	0	0	0	1,572	29,288	0	0	0
04-12	0	3,951	6,275	0	9,878	21,789	0	0	0
04-13	0	20,441	2,851	0	4,590	9,183	0	0	0
04-14	0	0	0	0	0	0	0	0	0
04-15	0	6,290	0	0	0	0	0	0	0
04-16A	0	2,822	0	0	0	256	0	0	0
04-16B	0	6,579	0	0	0	0	0	0	0
04-16C	0	9,761	0	0	0	0	0	0	0
04-16D	0	4,454	0	0	0	0	0	0	0
Total Acres	420	65,217	29,300	586	38,314	117,804	920	59,492	10,933
Total Area (%)	<1	6	3	0	3	11	<1	5	1

Management Direction—Appendix E

Table E-1 (cont.). Area (Acres) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area

Use Area	Semi-Remote Recreation	Scenic Viewshed	Wilderness	Wilderness Monument (WM)	Research Natural Area	Wild River	Scenic River	Non National Forest	Total Area of Shoreline Zone (acres)
01-01	11,859	0	0	0	0	5,184	0	0	19,583
01-02	50	0	0	0	0	0	0	515	2,887
01-03	12,113	10,904	0	0	0	0	0	10,985	39,845
01-04A	996	454	0	0	0	4,131	0	4,681	39,969
01-04B	6,897	1,246	0	0	0	0	0	24,121	32,574
01-04C	27,079	7,262	0	0	0	0	0	2,505	37,881
01-04D	0	1,255	0	0	0	0	0	0	1,459
01-05A	0	1,469	0	0	0	0	0	741	6,082
01-05B	32,328	3,703	0	0	0	0	0	710	48,462
01-05C	188	10,145	9,754	92	0	0	0	12,425	47,616
01-05D	7	0	40,439	0	0	0	0	0	40,446
01-05E	0	0	6,652	0	0	0	0	0	6,652
04-01A	0	0	23,767	0	0	0	0	0	29,818
04-01B	13,815	0	0	0	0	0	0	512	26,258
04-02A	8,228	0	0	0	0	0	0	2,999	15,943
04-02B	0	0	64,799	0	0	0	0	0	82,909
04-03	38,664	979	3,433	0	0	0	0	15,433	91,566
04-04A	602	775	0	0	0	0	0	52	13,508
04-04B	4,182	2,245	0	0	0	239	0	1,238	30,425
04-04C	1,757	0	0	0	0	0	0	554	3,233
04-05	0	0	0	24,323	0	0	0	1,273	25,596
04-06A	0	0	0	18,219	0	0	0	29	18,248
04-06B	0	0	0	19,674	0	0	0	37	19,730
04-07	0	0	0	22,541	2,110	179	0	24	24,882
04-08	10,589	0	0	22,228	0	0	0	2,952	36,189
04-09	0	0	0	33,405	0	192	0	447	34,044
04-10A	0	0	0	1,692	0	0	0	48	2,048
04-10B	9,198	0	0	11,579	0	0	0	1,851	22,906
04-11	330	3,945	5,242	0	0	0	0	16,013	56,390
04-12	225	2,823	0	0	0	0	165	8,076	53,182
04-13	124	10,180	1,639	0	0	0	0	2,178	51,186
04-14	0	0	29,865	0	0	0	0	310	30,175
04-15	13,539	0	46,712	0	0	233	0	2,180	68,954
04-16A	0	0	0	0	0	0	0	0	3,078
04-16B	0	0	0	0	0	0	0	167	6,746
04-16C	8	0	0	0	0	0	0	476	10,245
04-16D	3,170	0	8,247	0	0	0	0	195	16,066
Total Acres	195,948	57,385	240,549	153,753	2,110	10,158	165	113,727	1,096,781
Total Area (%)	18	5	22	14	<1	1	<1	10	100

Appendix E—Management Direction

Table E-2. Length (Miles) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area

Use Area	Experimental Forest	LUD II	Modified Landscape	Non-Wilderness Monument	Timber Production	Old Growth	Research Natural Area	Remote Recreation	Special Interest
01-01	0	0	2	0	0	0	0	2	0
01-02	0	0	8	0	0	0	0	0	0
01-03	0	0	8	0	0	12	0	0	0
01-04A	0	84	20	0	0	11	0	92	0
01-04B	0	0	0	0	0	1	0	0	0
01-04C	0	0	0	0	0	3	0	0	0
01-04D	0	0	0	0	0	0	0	0	0
01-05A	0	0	0	0	0	13	2	0	0
01-05B	0	0	4	0	8	15	0	15	0
01-05C	0	0	0	0	0	50	0	0	0
01-05D	0	0	0	0	0	0	0	0	0
01-05E	0	0	0	0	0	0	0	0	0
04-01A	0	0	0	0	0	0	0	27	0
04-01B	0	0	0	0	0	0	0	43	0
04-02A	0	0	0	0	0	32	0	0	0
04-02B	0	0	0	0	0	0	0	125	0
04-03	0	0	15	0	19	45	0	0	49
04-04A	0	0	0	0	27	13	0	0	0
04-04B	0	0	25	0	2	40	0	36	0
04-04C	0	0	0	0	0	0	0	3	0
04-05	0	0	0	0	0	0	0	0	0
04-06A	0	0	0	0	0	0	0	0	0
04-06B	0	0	0	0	0	0	0	0	0
04-07	0	0	0	0	0	0	0	0	0
04-08	1	0	0	0	0	0	0	0	0
04-09	0	0	0	0	0	0	0	0	0
04-10A	0	0	0	1	0	0	0	0	0
04-10B	0	0	0	0	0	0	0	0	0
04-11	0	0	0	0	0	128	0	0	0
04-12	0	14	39	0	10	91	0	0	0
04-13	0	83	17	0	1	36	0	0	0
04-14	0	0	0	0	0	0	0	0	0
04-15	0	21	0	0	0	0	0	0	0
04-16A	0	10	0	0	0	1	0	0	0
04-16B	0	33	0	0	0	0	0	0	0
04-16C	0	35	0	0	0	0	0	0	0
04-16D	0	17	0	0	0	0	0	0	0
Total Miles	1	297	138	1	67	491	2	343	49
Total Miles (%)	<1	5	2	<1	1	8	<1	6	1

Management Direction—Appendix E

Table E-2 (cont.). Length (Miles) of Shoreline Zone by Land Use Designation in the Shoreline Outfitter/Guide Analysis Area

Use Area	Semi-Remote Recreation	Scenic Viewshed	Wilderness	Wilderness Monument (WM)	WM/ Research Natural Area	Special Area	Wild River	Scenic River	Non National Forest	Total Miles
01-01	43	0	0	0	0	0	36	0	0	83
01-02	2	0	0	0	0	0	0	0	10	20
01-03	45	34	0	0	0	0	0	0	95	194
01-04A	5	0	0	0	0	0	48	0	24	284
01-04B	18	3	0	0	0	0	0	0	139	161
01-04C	134	26	0	0	0	0	0	0	18	181
01-04D	0	5	0	0	0	0	0	0	0	5
01-05A	0	5	0	0	0	0	0	0	4	24
01-05B	169	15	0	0	0	0	0	0	2	228
01-05C	8	48	28	7	0	0	0	0	74	215
01-05D	1	0	156	0	0	0	0	0	0	157
01-05E	0	0	22	0	0	0	0	0	0	22
04-01A	0	0	96	0	0	0	0	0	0	123
04-01B	92	0	0	0	0	0	0	0	6	141
04-02A	199	0	0	0	0	0	0	0	25	256
04-02B	0	0	400	0	0	0	0	0	0	525
04-03	259	8	20	0	0	0	0	0	171	586
04-04A	5	7	0	0	0	0	0	0	1	53
04-04B	33	16	0	0	0	0	1	0	10	163
04-04C	7	0	0	0	0	0	0	0	4	14
04-05	0	0	0	99	0	0	0	0	11	110
04-06A	0	0	0	124	0	0	0	0	1	125
04-06B	0	0	0	100	0	0	0	0	1	101
04-07	0	0	0	118	15	0	0	0	1	134
04-08	39	0	0	89	0	0	0	0	20	149
04-09	0	0	0	172	0	1	1	0	2	176
04-10A	0	0	0	8	0	0	0	0	0	9
04-10B	30	0	0	43	0	0	0	0	11	84
04-11	11	22	24	0	0	0	0	0	82	267
04-12	5	17	0	0	0	0	0	1	35	212
04-13	7	47	5	0	0	0	0	0	17	213
04-14	0	0	244	0	0	0	0	0	2	246
04-15	63	0	529	0	0	0	1	0	19	633
04-16A	0	0	0	0	0	0	0	0	0	11
04-16B	1	0	0	0	0	0	0	0	1	35
04-16C	1	0	0	0	0	0	0	0	3	39
04-16D	21	0	53	0	0	0	0	0	4	95
Total Miles	1198	253	1577	760	15	1	87	1	793	6074
Total Miles (%)	20	4	26	13	<1	<1	1	<1	13	100

Appendix E—Management Direction



Appendix F

Recreation Management Concepts

Appendix F

Recreation Management Concepts

Introduction

The analysis area is managed for multiple uses including recreation and wilderness resources. The Forest Service plays an important role in the changing and diverse economic environment of Southeast Alaska.

Some forest management activities result in a product that is relatively easy to measure. For example, a timber sale will produce a specific amount of timber; the construction of a fish pass will allow fish to access a measurable area of new habitat. It is more difficult to quantify the products of this project, which seeks to manage or enhance a wild land recreation experience. People have a wide range of expectations and values and they have many different definitions of a satisfying recreational experience.

The challenge for the Forest Service is to respond to the public's desires for various kinds of settings and access. The Forest Service manages its lands to provide the public with a variety of recreation opportunities. We can influence the recreation experience by (a) providing different settings for recreation, ranging from wilderness to fully accessible trails and campgrounds; and (b) providing different facilities, such as cabins, boat moorings or roads, that make an area more accessible. Through this analysis, we are working to manage the recreation setting by regulating the number of commercially guided groups using specific shoreline-based areas.

The goal is to provide opportunities for quality recreation experiences sought by both guided and unguided users that will not adversely impact forest resources. This will be accomplished by managing the analysis area so that each Use Area conforms to the Recreation Opportunity Spectrum (ROS) class setting indicators stated in the Forest Plan.

Forest Plan and the Recreation Opportunity Spectrum

The Forest Plan provides the management framework for the recreation resource. Recreation and tourism management goals were developed through scientific review and in response to public comment. They are specified in the Forest Plan.

The primary way that the Forest Plan categorizes national forest lands is by dividing it into a series of areas that are each described by a Land Use Designation (LUD). Each LUD has a management prescription that includes goals, objectives, and a desired future condition. LUDs also include standards and guidelines for managing

Appendix F—Recreation Management

recreation and other forest resources. Chapter 1 and Appendix E discuss the Land Use Designations.

The Forest Plan assigns a range of recreation settings for each LUD using the ROS classifications. These are intended to cover the full range, or spectrum, of desired recreation opportunities. The ROS classes, from least developed to most developed, are listed below.

- Primitive
- Semi-Primitive Non-motorized
- Semi-Primitive Motorized
- Roaded Natural
- Rural
- Urban

The ROS is as an inventory tool used to describe the existing condition of potential recreation opportunities on the national forest. Guidelines for each ROS class describe the physical, social, and managerial setting components that affect the kind of experience forest visitors may expect. It is also used to guide management activities in order to maintain or attain the defined range of recreation opportunities within the ROS class setting. Each LUD may include more than one ROS class. ROS classifications used in the Forest Plan by LUD are displayed in Table F-1.

Recreation Management—Appendix F

Table F-1. Forest Plan ROS Classification by Land Use Designation (LUD)

Land Use Designation	ROS Classification
Wilderness	Primitive and Semi-Primitive
Wilderness National Monument	Primitive and Semi-Primitive
Non-Wilderness National Monument	Existing unless scheduled activities cause a change.
Research Natural Area	No specific direction in the Forest Plan. Primitive is usually appropriate.
Special Interest Area	Adopt through project planning. Before planning, manage as existing.
Remote Recreation	Primitive
Municipal Watershed	No specific direction in the Forest Plan. Primitive or Semi-primitive are usually appropriate.
Old-growth Habitat	Semi-Primitive
Semi-remote Recreation	Semi-Primitive generally, Enclaves up to Rural
LUD II	Semi-Primitive
Wild River	Primitive and Semi-Primitive
Scenic River	Existing unless scheduled activities cause a change.
Recreational River	Existing unless scheduled activities cause a change.
Experimental Forest	Existing unless scheduled activities cause a change.
Scenic Viewshed	Existing unless scheduled activities cause a change. Change to Semi-primitive Motorized, Roded Natural, or Roded Modified is allowed.
Modified Landscape	Existing unless scheduled activities cause a change. Change to Semi-primitive Motorized, Roded Natural, or Roded Modified is allowed.
Timber Production	Existing unless scheduled activities cause a change. Change to Semi-primitive Motorized, Roded Natural, or Roded Modified is allowed.
Minerals	Existing unless scheduled activities cause a change. Change to Semi-primitive Motorized, Roded Natural, or Roded Modified is allowed.
Transportation/Utility Systems	Manage changed setting with appropriate ROS guidelines.

For each ROS class, the Forest Plan identifies setting indicators that describe the class. The indicators are visual quality, access, remoteness, visitor management, on-site recreation development, social encounters, and visitor impacts. The standards and guidelines for ROS classes are found in Table F-2. Not all of the criteria outlined in the standards and guidelines, such as Visual Quality Objectives, Traffic Service Levels, the Recreation Development Scale and Road Maintenance Levels are fully defined in this document; see the Forest Plan for a complete discussion of all ROS standards and guideline components.

Appendix F—Recreation Management

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications

Primitive ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Retention Visual Quality Objective. An Existing Visual Condition of Preservation is fully compatible and encouraged.
Access	Cross-country travel and travel on non-motorized trails and on waterways is typical. Use of airplanes, helicopters, motorboats and snowmachines for traditional activities, subsistence, emergency search and rescue, and other authorized resource management activities may occur but is rare.
Remoteness	No or infrequent sights and sounds of human activity are present. Setting is located more than 1.5 hours walking or paddling distance, or 3 miles, from any human developments other than infrequently-traveled marine travelways. Areas are generally greater than 5,000 acres, but may be smaller if contiguous with a Semi-primitive class.
Visitor Management	On-site regimentation and controls are very rare. Signing is limited to directional information and safety. There are no on-site interpretive facilities. There is great opportunity for discovery on the part of the users.
On-site Recreation Development	Structures do not exceed Development Scale I, except for public recreation cabins, and are maintained for appropriate levels of use.
Social Encounters	User meets less than 3 parties per day during trip. No other parties are within sight or sound of dispersed campsites or cabins. Maximum party size is generally 12 people.
Visitor Impacts	Visitor-caused impacts to resources are slight and usually not noticeable the following year. Site hardening is limited to boardwalk trails and necessary boat moorings or bearproof food caches and rustic public recreation cabins.

Recreation Management—Appendix F

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Semi-Primitive Non-Motorized ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Retention Visual Quality Objective. An Existing Visual Condition of Preservation is fully compatible and encouraged.
Access	Cross-country travel and travel on non-motorized trails is typical. Use of airplanes, helicopters, motorboats and snowmachines for traditional activities, subsistence, emergency search and rescue, and other authorized resource management activities may occur unless specifically restricted for safety and/or resource protection purposes.
Remoteness	Nearby sights or sounds of human activity are rare, but distant sights or sounds may occur. Setting is located more than ½ hour walk or paddle, or approximately ½ mile (greater or less depending on terrain and vegetation, but no less than ¼ mile) from: 1) infrequently traveled waterways; 2) roads and trails open to motorized recreation use, and 3) clearcut harvest areas. Aircraft access is only occasional. Areas are generally greater than 2,500 acres but may be smaller if contiguous with Primitive or Semi-primitive motorized classes.
Visitor Management	On-site regimentation and controls are rare. Visitor information facilities may be used to interpret cultural and natural resource features, but are not elaborate and harmonize with the setting.
On-site Recreation Development	Facilities and structures generally do not exceed Development Scale II and are maintained to accommodate the types and levels of use anticipated for the site. Forest Service recreation cabins are fully compatible.
Social Encounters	User meets less than 10 parties per day (6 parties per day in wilderness) on trails and waterways during 80% of the primary use season. No other parties are within sight or sound of dispersed campsites during 80% of the primary use season. Maximum party size is generally 12-20 people. Outside of wilderness, larger party sizes may occur during less than 15% of the primary use season in limited locations.
Visitor Impacts	Visitor-caused impacts to resources are rare and usually not long lasting. Site hardening is limited to boardwalk trails, boat tramways, moorings and docks, bearproof food cache facilities and rustic public recreation cabins.

Appendix F—Recreation Management

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Semi-Primitive Motorized ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Partial Retention Visual Quality Objective. Existing Visual Conditions ranging from Preservation through Retention are fully compatible and encouraged.
Access	Travel on motorized and non-motorized trails and Traffic Service Level D roads, although some Traffic Service Level C roads provide access to and through the area. Use by high clearance vehicles and motorized water travel is common. Road density is less than one mile per square mile. Off-road vehicle travel may occur on snow.
Remoteness	Nearby sights or sounds of human activity are rare, but distant sights or sounds may occur. Setting is located within ½ hour walk or paddle or within ½ mile (greater or less depending on terrain and vegetation but no less than ¼ mile) of infrequently traveled waterways or small aircraft access points and/or roads which are open and maintained for passage by high clearance and four-wheel drive vehicles (Maintenance Level 2) and provide access to recreation opportunities and facilities. Areas are generally greater than 2,500 acres but may be smaller if contiguous with Primitive or Semi-Primitive Non-Motorized classes.
Visitor Management	On-site regimentation and controls are few. Control facilities consist primarily of informational signs and site-specific road closures. Visitor information facilities may be used to interpret cultural and natural resource features, but are not elaborate and harmonize with the setting.
Social Encounters	User meets less than 10 parties per day (6 parties per day in wilderness) on trails, roads, and shorelines during 80% of the primary use season. During 80% of the primary use season no other parties are visible from campsites. Maximum party size is generally 12-20 people. Outside of wilderness, larger party sizes may occur during less than 15% of the primary use season in limited locations.
Visitor Impacts	Visitor-caused impacts may be noticeable, but not degrading to basic resource elements. Site hardening is very infrequent, but when it occurs, is in harmony with, and appropriate for, the natural-appearing backcountry setting.

Recreation Management—Appendix F

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Roaded Natural ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Modification Visual Quality Objective and typically is Partial Retention. Existing Visual Conditions ranging from Preservation through Retention are fully compatible and encouraged.
Access	All forms of access and travel modes may occur. Access to and through the area is typically by passenger vehicle, although motorized use may be restricted to provide for resource protection, user safety, or to provide a diversity of recreation opportunity.
Remoteness	Remoteness is of little importance, but low to moderate concentrations of human sights and sounds are preferred. Setting is located within ½ mile (greater or less depending on terrain and vegetation but no less than ¼ mile) of moderate to heavily-traveled waterways and/or roads which are maintained to Levels 3, 4, and 5 and open for use by the public or those areas that receive heavy small aircraft travel.
Visitor Management	On-site regimentation and controls are obvious. Control facilities such as parking areas, barriers, and signs harmonize with the natural environment. Visitor information facilities are not elaborate or complex.
On-site Recreation Development	Facilities and structures generally do not exceed Development Scale III and are maintained to accommodate the types and levels of use anticipated for the site and area. Typical facilities include outdoor interpretive displays and rustic campgrounds and picnic areas.
Social Encounters	User meets less than 20 other parties per day on trails and in dispersed areas, during at least 80% of the primary use season. User may meet numerous other parties on roads and developed recreation sites. Developed sites often are at full capacity but do not exceed 80% of the design capacity over the season of operation.
Visitor Impacts	Visitor-caused impacts are noticeable, but not degrading to basic resource elements nor do they exceed established Visual Quality Objectives. Site hardening may be dominant, but is in harmony with natural-appearing landscape and appropriate for the site and setting.

Appendix F—Recreation Management

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Roaded Modified ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Maximum Modification Visual Quality Objective. Apply visual management techniques to soften effects of maximum modification conditions in the foreground of sensitive travel routes and recreation sites.
Access	All forms of access and travel modes may occur, although roads are generally not well suited to highway-type vehicles. Off Highway Vehicle use on designated routes or areas is encouraged. Use by high clearance vehicles is common.
Remoteness	Remoteness from urban conditions and high concentrations of other people is important. Low concentrations of human sights and sounds in a backcountry roaded setting are preferred. These areas are accessed by Forest roads that are maintained to Levels 2, 3, and 4; and are available for public use. They generally involve areas with timber management activities.
Visitor Management	On-site regimentation and controls are few. Control facilities are appropriate for the predominating backcountry roaded setting. Visitor information facilities may be used to interpret management activities, but are not elaborate and are appropriate for the setting.
On-site Recreation Development	Facilities and structures generally do not exceed Development Scale II and are maintained to accommodate the types and levels of use anticipated for the site and area.
Social Encounters	User meets less than 20 other parties per day on trails and in dispersed areas during at least 80% of the primary use season. Numerous other parties may be encountered on roads. Few parties are visible at dispersed campsites.
Visitor Impacts	Visitor-caused impacts are noticeable, but not degrading to basic resource elements. Site hardening may dominate at campsites and parking areas, but is in harmony with, and appropriate for, backcountry roaded setting.

Recreation Management—Appendix F

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Rural ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed Modification in the Foreground and Maximum Modification in middleground.
Access	All forms of access and travel modes may occur, although access to and through the area is primarily by passenger vehicle. Road and trail surfaces are often hardened.
Remoteness	Remoteness is of little importance, and moderate to high concentrations of people and sights and sounds of human activity are acceptable when not continuous. Setting is located within ½ mile of heavily traveled roads and state highways or areas that receive heavy aircraft travel.
Visitor Management	On-site regimentation and controls are obvious. Control facilities such as parking areas, medians, and barriers harmonize with natural/exotic landscaping. Information and interpretive facilities may be complex and dominant on developed sites.
On-site Recreation Development	All Development Scales (I-V) are appropriate and maintained at intended standards necessary to accommodate the types and levels of use anticipated for the site and area. Facilities typically include visitor centers, major campgrounds, and other facilities for concentrated use.
Social Encounters	User may meet many (more than 20) other parties per day on trails, in dispersed areas, on roads, and in developed facilities. Developed sites often are at full capacity, but do not exceed 80% of the design capacity over the operating season.
Visitor Impacts	Visitor-caused impacts are noticeable, but not degrading to basic resource elements nor do they exceed established Visual Quality Objectives. Site hardening may be dominant, but is in harmony with natural/exotic landscape.

Appendix F—Recreation Management

Table F-2. Forest Plan Standards and Guidelines for ROS Classifications (cont.)

Urban ROS Class	
Setting Indicators	Standards and Guidelines
Visual Quality	Not to exceed the Modification Visual Quality Objective in the foreground and Maximum Modification in middle ground.
Access	Access and travel facilities are highly intense, motorized and often with mass transit supplements.
Remoteness	Remoteness is not important. High concentrations of people, and sights and sounds of human activity are acceptable.
Visitor Management	Intensive on-site controls are numerous and obvious. Information and interpretive facilities may be complex and dominant.
On-site Recreation Development	All Development Scales (I-V) are appropriate and maintained at intended standards necessary to accommodate the types and levels of use anticipated for the site and area. Synthetic materials are commonly used. Facility design may be highly complex and refined, but in harmony or complimentary to the site. Facilities typically include visitor centers, major campgrounds and other facilities for concentrated use.
Social Encounters	Interaction between large numbers of users is high. Sites often are at full capacity, but do not exceed 80% of the design capacity over the operating season.
Visitor Impacts	Visitor-caused impacts are noticeable, but not degrading to basic resource elements or exceed established Visual Quality Objectives. Site hardening may be dominant, but is in harmony with natural/exotic landscape and appropriate for the site and setting.

Recreation Carrying Capacity Analysis

Recreation carrying capacity is the number of recreation users that can be accommodated in a given area without loss of the quality of the natural environment and/or the visitor experience. The *Shoreline Based Recreation Carrying Capacity Analysis for the Admiralty Island National Monument, Hoonah, Juneau, and Sitka Ranger Districts 2001 (Shoreline RCC)* (USDA Forest Service 2001) documents an analysis that determined the recreation carrying capacity of a shoreline zone extending from mean high tide to one-half mile inland. It is used as the basis for determining effects in this EIS. The *Shoreline RCC* compiled the applicable policy, direction, and information related to recreation management on the four districts. Use Areas were defined and described, and unique carrying capacities (groups at one time) were calculated for each individual Use Area. Carrying capacity numbers were derived by determining the number of group encounters expected in a day within each specific Use Area considering the ROS class standards for social

Recreation Management—Appendix F

Types of Recreation Carrying Capacity

encounters indicated in the Forest Plan. From this information, allocations were made for each Use Area in terms of “group days”.

The following four types of recreation carrying capacity were considered in the *Shoreline RCC*. The social carrying capacity was found to be the most limiting and was used to develop the recreation carrying capacity.

- Physical — The amount of recreational use that can physically occur in a defined space without regard to the quality of the experience.
- Facility — The amount of recreational use that can occur within the constraints of existing facilities and improvements intended for visitor needs, such as parking lots, trails, docks, restrooms, and developed campgrounds.
- Ecological — The amount of recreational use that can occur without creating unacceptable impacts on the ecosystem.
- Social — The amount of recreational use that can occur without impairing social experiences. Social carrying capacity is the level of use beyond which social impacts exceed acceptable levels specified by evaluative standards (Shelby and Haeberlein 1986).

Physical Carrying Capacity

The physical carrying capacity for the Shoreline analysis area is extraordinary with over 5,280 miles of shoreline and 983,060 acres available for recreation use. Physically the project area could accommodate many more groups than optimum and realistic use indicates. The theoretical physical capacity is so large that managing for that number would exceed Forest Plan standards and guidelines. Recreation use is not expected to ever approach the physical capability; therefore, it is not a limiting factor.

Facility Carrying Capacity

The facility carrying capacity is not a limiting factor for the Shoreline project because most recreation use in the analysis area does not rely on Forest Service facilities. Most recreational use is wild land oriented and primarily boat-based with recreationists and outfitter/guides providing their own services and facilities.

Ecological Carrying Capacity

The ecological carrying capacity was generally not found to be a limiting factor in the analysis area because of the low impact of the recreation activities and the relatively low levels of use throughout most of the area. However, it is an important consideration in this analysis. A limited number of sites were identified that are approaching ecological carrying capacity. These are considered in this analysis and will require monitoring. No new facilities or ground-disturbing activities are considered in this analysis.

In addition to low levels of use, most recreation activities in the analysis area are of short duration and low impact. Dispersed remote recreation activities such as sightseeing, hiking, photography, boating, hunting, and fishing are the most common uses. Access is most often by boat and an outing is usually completed within daylight hours without the need for camping. To date, our monitoring has not shown significant ecological effects from recreational use.

Appendix F—Recreation Management

Social Carrying Capacity

The *Shoreline RCC* found that the social carrying capacity is the most limiting factor for recreation use in the analysis area. It determined the social carrying capacity in terms of the daily number of groups in an area limited by a specific number of group encounters. Group encounters are an important part of the ROS classification used to define the expected recreation experience.

The goal is to manage the area so that the number of group encounters per day is within Forest Plan ROS guidelines (see Chapter 3, Table 3-1). These guidelines identify the number of encounters one may expect to experience in a day, maximum party size, and number of parties within sight or sound of dispersed campsites.

Three components are used in this analysis to manage social recreation carrying capacity for the analysis area: Use Areas, groups-at-one-time, and seasons of use.

Social Recreation Carrying Capacity Components

Use Areas

The analysis area was subdivided into 38 Use Areas, 37 of which contain a shoreline zone and are included in this analysis. See Figure 1-1 and Appendix A for the location and description of each Use Area.

Groups-at-One-Time and Group Days

The *Shoreline RCC* defines the recreation carrying capacity in terms of group days. These are determined by establishing the number of groups-at-one-time that can be in an area.

The basic social recreation component for the carrying capacity assessment is the number of social encounters a group has while recreating. In the analysis area, recreation occurs primarily as groups of people rather than as individuals. Within group encounters are not considered because people within the group typically choose to be with each other. A 'group' may be one person recreating alone or more than one person recreating together. 'Groups-at-one-time' is the number of groups that could recreate in a specific area without exceeding the number of group encounters specified by the ROS class to achieve a specific type of recreation experience.

Each Use Area was evaluated by the existing recreation setting, Land Use Designations and ROS classifications in the Forest Plan. Maps, photos, and field observations were used to determine the physical characteristics of each Use Area. Suitability of the land for recreation use was a key consideration in developing the number of groups that could be in Use Areas without exceeding ROS class standards.

Because not every acre of land or mile of shoreline has the same suitability for recreation use, the areas that were most accessible were evaluated to determine a Use Area's capacity. Much of the area in the shoreline zone is functionally less desirable to most people because of thick vegetation, wet areas, steep terrain, or the cost of reaching remote areas. Most desirable areas tend to be relatively flat, open, drier areas without thick underbrush. A majority of the coastline is rugged and rocky, so easy access by boat is limited primarily to protected bays and beaches. Areas were assessed by where boats could access the shoreline and where groups could reasonably recreate given the local topography within each Use Area.

Recreation Management—Appendix F

Easy access from the surrounding marine waters, usually by motorized watercraft, provides a high degree of mobility for most recreationists in the analysis area. This was considered in the carrying capacity determination. Highly mobile boat access increases the possibility of encountering other parties but also enables users to disperse to less crowded areas if they desire.

After determining generally where most recreation use occurs and where people were most likely to be able to access suitable areas of the national forest, the ROS criteria for social encounters was applied. These criteria identify (1) the number of encounters with other groups per day and (2) the number of other parties within sight or sound of dispersed campsites. The number of social encounters was refined by looking at topographical features to evaluate the irregularity of the shoreline and type of vegetative cover present. This information was used to predict views and sound patterns from the most likely anchorages and recreation places. This provided the groups-at-one-time in a Use Area.

Groups of people on boats traveling, sightseeing, fishing, or anchored on the saltwater were not considered to be national forest users for the purposes of this EIS and are not factored into the groups-at-one-time figure in the carrying capacity. Groups on salt water at access points to national forest were considered only in conjunction with their upland use. See the *Shoreline RCC* (USDA Forest Service 2001) for more information on methodology and data sources.

It was necessary to use a range of group sizes in the analysis, to account for differences in how people recreate on the landscape, and to better describe potential impacts of their use. In general, groups of 1-12 people, regardless of how they split into party sizes on shore, would count as one group. Any group with 13-20 people would count as two group days. Any group of 21-40 people would count as three group days. Groups of 41-75 people would count as four group days. Groups larger than 75 people would not be authorized through this analysis but could be allowed on a case-by-case basis as approved by the authorizing officer. Groups of 75 people or less is consistent with the group size of non-commercial gatherings allowed in one place at one time without a special use authorization. This group size generally matches the current size of the largest groups going ashore at one time.

Seasons

To better manage for the different activities and levels of use that occur at different times of the year, recreation seasons were identified to provide a temporal measure for recreation management and use. The seasons are displayed in Table F-3.

There are differences in recreation activities and use patterns among the different seasons. Weather, temperature, length of daylight, and fishing and hunting regulations govern many activities. The summer season is the busiest season of the year for both commercial and non-commercial recreation activities except hunting. Brown bear hunting is the predominant recreation activity occurring in the project area during the spring season, along with some steelhead fishing. In the fall, brown bear, deer and waterfowl hunting are popular activities. The end of the spring season and the beginning of the fall season are known as ‘shoulders’ to the peak summer season. Traditional summer activities, specifically freshwater fishing and sightseeing, are increasing in these shoulder seasons. Because little or no commercial recreation use occurs during the winter season, no management is proposed in this analysis for the winter season.

Appendix F—Recreation Management

Table F-3. Dates and Number of Days of Seasonal Use

Season	Starting Date	Ending Date	Length in Days
Spring	April 20	May 31	42
Summer	June 1	September 14	106
Fall	September 15	October 31	47
Annual	April 20	October 31	195

To determine the seasonal recreation carrying capacity for each use area, the groups-at-one-time for each Use Area (based on the number of social encounters allowed by the ROS class) was multiplied by the number of days in each season. All three seasonal recreation carrying capacities were added together for the total recreation capacity for the analysis area.

The consideration of the seasons in a final decision could also incorporate new or updated information based on actual use reports provided by outfitter/guides. These reports may help to refine the seasons as they provide specific information regarding the pattern of use by outfitter/guides.

Appendix G

Response to Comments on the Shoreline Outfitter/Guide Draft EIS

Table of Contents for Appendix G

Introduction.....	2
Issues.....	2
Reason and Preference for an Alternative.....	2
Brown Bear Management Team Recommendations.....	8
Bear/Human Conflicts	9
Bear Habitat Concerns	10
Bear Hunting/Allocation Concerns	10
Seal Concerns	12
Other Wildlife Concerns	13
Fisheries Concerns	14
Soils and Vegetation Concerns	15
Community Concerns and Impacts	17
Southeast Alaska Economic Issues	18
Conflicts Due to Proximity to Private Inholdings.....	21
Recreation Facility Needs	23
Large Group Areas/Defining Large Group Use.....	25
Subsistence	28
Questions of the Inventory Used in the Analysis.....	31
Forest Plan Consistency/Demand Analysis	32
Manual Direction/Legislative Concerns	39
Capacity Analysis Comments	43
Monitoring	47
Mitigation	50
Heritage Resources	53
Types of Access (airplanes, boats, etc.).....	54
Public Process	56
Guide Allocation Issues.....	59
ROS Clarification	62
Incremental Implementation	66
Document Inconsistencies	67
Activity-specific Guide Allocations.....	72
Coordination with Other Agencies	76
Special Use Permit Administration Issues	78
Official Comments on the Shoreline Outfitter/Guide Draft EIS	85

Appendix G—Response to Comments

Introduction

The formal comment period on the Draft Environmental Impact Statement (Draft EIS) for the Shoreline Outfitter/Guide on the Tongass National Forest in Alaska ended on January 3, 2003. Approximately one hundred and fifty substantive comments were received.

All comments have been analyzed using a process called content analysis. Concerns have been categorized and documented in a table that has been placed in the Shoreline Project Planning Record. The goal of the content analysis process is to identify all relevant issues, not just those represented by the majority of respondents. In addition to capturing relevant factual input, the relative emotion and strength of public sentiment behind particular viewpoints have been identified. Our intention is to represent the public's viewpoints and concerns as fairly as possible, and to effectively respond to those concerns.

The comments have been grouped into 31 broad topics as shown in the table of contents for this appendix. Letters from federal and state agencies, cities, and tribes is also included in this appendix.

Issues

The discussion of issues is included below. Specific comments are presented to emphasize or clarify the points addressed in the FEIS. Not all comments are displayed, as many were duplicative. However, all comments were considered in the analysis or are addressed as to why they could not be addressed in this document.

Reason and Preference for an Alternative

Following are the responses for a preference for alternatives. Where details for support were provided, they were included with the text of the alternative preference. Following the comments to support a specific alternative, there are comments for why some alternatives should not be chosen and some suggestions for alternative modifications.

I. Support was provided for several of the alternatives.

Comment 43: ...for Chichagof Island/Tenakee, the USFS should adopt Alternative 1 (no action, continue current case-by-case permitting with a moratorium on new or additional use permits and allowing no large group designations). It is difficult to understand how an area such as this with minimal roads can be other than seriously degraded by the traffic allowed by Alternative 2 through 5.

Response to Comments—Appendix G

Comment 13: I lean towards the Alternative #2 that provides emphasis on limited commercial use during spring and fall, **no large group areas**, no wheeled airplane access. But I still have concerns that it lacks specifying the maximum size of large groups, which I think need to be regulated as well.

Comment 92: (We) would be most supportive of Alternative 2 with some modifications...For established operators... permits could be issued on a longer-term basis, thus establishing some stability. Broad general regulations and restrictions which are proposed by Alternatives 3, 4 and 5 of the DEIS are insensitive to the needs and issues of the diverse spectrum of individual outfitter/guides and other recreational users....

Comment 4: I conditionally support Alternatives 2 and 5. While we do not hunt, we have no quarrel with bear hunt guides. We never encounter a guided hunt in 04-14, partly because we frequent other areas, especially the barrier islands. So there is no reason to restrict spring commercial use of 04-14 to guided bear hunts. But that will be the likely effect under Alt. 2 or 5.

Comment 121: We support the implementation of allocation and management policies that will reasonably meet increasing demand for recreation in the Tongass while protecting the ecosystem and maintaining quality recreation experiences for all recreationists in this unique and remote National Forest. In our view, these goals are best met by the allocation of Recreation Carrying Capacity and the management objectives proposed in alternative 2 and 5. Between these two alternatives, we favor Alternative 2 because it provides: Higher summer-season commercial allocations, greater protections to ensure quality recreational experiences for all users.

Comment 23: The **most viable alternative is the suggested list is Alternative 3** as this alternative opens up the use of the NF to the most people under a controlled access environment.

Comment 39: The best choice of a very poor set of options from the commercial outfitting standpoint would be **Alternative 3**; with Alternative 1 being our second choice...Your lack of consideration and support for the use [of] National Forests lands in SE Alaska by non-residents and the outfitter guides industry has and will obviously continue to adversely influence our rural economies.

Comment 2: Alternative 4 is more reasonable in terms of honoring the Tier 1 (Brown Bear Management Team (BBMT) Recommendation) designation.

Comment 9: Please register my comments on the DEIS to reflect my support for Alternative #4 with the following amendments; a) Designate Kadashan, Trap Bay, Saltery Bay, Seal Bay, Long Bay and Goose Flats a Primitive/Semi-primitive non-motorized; b) Protect Goose Flats by prohibiting enclaves there.

Comment 18: (We) support Alternative 4, though we feel there are still key issues to be addressed. (We) would like to see use limits established. This would allow preservation of the quality recreational experience that we all want to share with our friends and our guest.

Appendix G—Response to Comments

Comment 20: THEREFORE BE IT RESOLVED that the Common council of the City of Tenakee Springs hereby supports a level of activity more consistent with Alternative 4 and with further modification of large group enclaves and 15% groups and multiple smaller group areas more consistent with existing recreation activities...supports an adaptive management approach that provides for responsible commercial recreational development within a framework that supplies the Forest Service with the high quality information it needs to make responsible decisions.

Comment 37: I support Alternative 4. The FS preferred alternative (Alt[5]) favors the commercial interests of these shorelines. The FS has “rolled over” on this one too early in the game. The demand for those choice “jewels” along our shorelines is just beginning. We haven’t seen anything yet! Why give up so early?

Comment 26: ...there is not sufficient data to support the Forest Service’s perceived need for the huge increase in guided activities that is provided for in you preferred alternative, alternative 5 of the DEIS...Therefore, it makes vastly more sense to go with a more reasonable level of usage as is indicated in alternative 4 which provides for an increase of something over 200% and is certainly more than adequate to accommodate the needs of the commercial market. Even alternative 4 may prove to be excessive...if we must choose one of the action alternatives, we could probably learn to live with most of the provisions of alternative 4 with a couple of modifications.

Comment 41: I recognize the need for this growing segment of our economy to be regulated, and while I do not have unreserved admiration for any of the proposed alternatives, I find Alternative 4 the most appealing. Quite frankly, I like peace and quiet, and find the intrusion of small cruise ships galling.

Comment 60: The more modest increases in alternative 4 still meet demand for commercial use, but do a better job of preventing over-crowding in “hot spots” like Point Adolphus and Mud Bay, which are already highly used by commercial guiding businesses.

Comment 66: As a guide in the area I feel that a moratorium or the modest increases outlined in alternative 4 will do a better job of preventing over-crowding in “hot spots” like Point Adolphus. Commercial activity in the area must be slowed down so that private visitors can have a better experience and so that quality of commercial trips resemble a wilderness experience, rather than a lowest-common-denominator “theme park” type of experience.

Comment 54: ...based on current demand, that large and very large group usage be reduced to may fewer sites than proposed in the preferred alternative, perhaps more inline with alternative 4.

Comment 75: Alternative 4 is more reasonable...Still, this is a big jump in use and the impact of motorboats on bears does not appear to be considered.

Response to Comments—Appendix G

Comment 96: I have lived in the Tongass National Forest for the last 30 years. Eight of those 30 years was at Wheeler Creek, I have seen the amount of people using the Tongass go up 1000 percent or more. I support slow growth. I support Alternative 4.

Comment 98: Our family supports Alternative #4 – with no commercialized use of Cordwood Creek on Admiralty Island.

Comment 108: I prefer aspects of alternative 4 because it is closer to present use levels. However, some aspects of Alt. 4 are inferior to Alt 2. (the proposed [action]alternative), for example Alt. 4 allows limited wheeled airplane landings in Mud Bay. I believe that no such landings should be allowed in Mud Bay.

Comment 122: (We) voted to support alternative four, with the addition of more enclave areas...Thus, (we) support allowing only 8% of the carrying capacity to be devoted to commercial outfitters and guides, while allowing the larger groups to utilize more locations, so as not to disperse the effect these users have on the Forest. (We) support alternative four because we felt that it gives ample room for growth of the cruise ship industry in the Sitka area, especially for the next ten years, while ensuring that subsistence activities are not restricted along the shoreline of the Tongass National Forest. (We) support enclave or 15 percent areas in the following locations....Eagle River Road, Point Elizabeth, Nisemi Point, Sitkoh Bay Road, Patterson Bay, Rodman Bay, and Nelson falls: It is important for tourists to experience the Tongass first hand, as a visit to the forest will only encourage more responsible stewardship of these lands.

Comment 55: Alternative 5 may appear to offer a good compromise for varied use of the land. It allows for several use days, allows for a limited amount of large group enclave areas, and designates a 15% area. Not too much increase in use and not too little. I feel, however, that Alt. 5 is still a detrimental increase in use of Forest Service land. I simply feel that Alt. 5 still errs on the side of giving out too much in the beginning before addressing that realizing the impact it will have on the quality of life we now presently enjoy in Tenakee... Alternative 4 is closes to my idea of a realistic increase in the use of Forest Service land.

Comment 30: We support Alternative 5 with the revisions recommended...The plan should be evaluated using current (2002) commercial use levels and locations to ensure they can be accommodated...Reducing spring and fall allocations to 10% of the commercial total for all locations is extreme. A 10% commercial allocation may be warranted in some areas while higher percentages may work well in others...steelhead in spring and Silver Salmon (fishing) in the fall...is on the rise and opportunity for growth in guided spring and fall fishing should be built into the proposed allocation system in view of that demand.

Comment 67: Alternative 5, as described, seems to offer a number of reasonable compromises that will allow growth in commercial (as well as non-commercial) use but will provide limitations as well. Many of the clients who use our members' services are seeking solitude, and protecting wild places will also protect those businesses futures...Although we support most of alternative 5, and overall we consider it the best alternative, we hope that you will reconsider the

Appendix G—Response to Comments

proposed commercial use limits specific to Pybus Bay until you have better data to support your proposal and until you research the effects these limits will have on small and mid-sized commercial operators.

Comment 131: We support the emphasis of alternative 4 on maintaining solitude and the most cautious allocation.

II. There were also comments not to support some alternatives:

Comment 4: Alternatives 1 and 3 (are) totally inadequate. They would each allow commercial use to reach a level roughly 100 times what was in 1999.

Comment 26: There should be areas that are off limits to commercial operations altogether... an increase in guided usage of more than 700% (as in alternative 5) is simply not acceptable. This level of guided use would virtually assure that there would be nowhere in this area that one could go and not be confronted with, or overwhelmed by, commercial operators.

Comment 27: The stated purpose to “balance commercial and non-commercial recreation opportunities and reduce the potential for user conflict” (DEIS at ii) can only be achieved by designating portions of the planning area as commercial free. In fact, the Forest Service scoping process revealed that a “**large number**” of comments requested commercial free zones.”

Comment 75: Alternative 5; Ridiculous increases in commercial use are unjustified by demand, Impacts at proposed use levels cannot be adequately predicted given lack of information – use levels area presently so low and there is no real monitoring program in place, Based on personal knowledge, Point Adolphus recreational experience would be significantly devalued by proposed 64% increase in commercial use, Likely impacts on bears in Mud Bay are totally unacceptable.

Comment 131: We do not support the no action alternative, because we believe it important that the Forest Service address recreation management in a more systematic way than case-by-case review. We believe alternative 3 is a very dangerous choice, given the lack of data on existing use.

III. There were also specific suggestions for the alternatives too:

Comment 113: This No-action alternative is a possible choice for the decision maker, so it belongs in the EIS. There should, however, be in addition an Exiting Conditions alternative-one that freezes commercial use at existing levels, and can therefore serve as the needed baseline for the EIS. It too is a possible choice for the decision maker, and should be considered as a reasonable alternative. The alternative (no action) is not useful in evaluating the action alternatives, as attempted in Table 2-13, p. 2-45, and in fact because of the peculiar character of the alternative, it adds confusion and could result in inaccurate evaluations. For example, for Issue 1 in the Table, under the item “Estimated number of people who could use commercial services,” the values for the three other alternatives are substantially lower. This is extraordinary for a No-action alternative, and misleading!.....explore restricting commercial use in

Response to Comments—Appendix G

the summer. Some of the existing alternatives consider restrictions in the shoulder seasons to, for example, reduce conflicts with bear guides. The same favor should be considered for resident and non-resident independent users in their prime season-summer. These users need solitude for their activities too.

Comment 27: We also request additional alternatives be considered which allow for less than 1999 levels so that concerns expressed in scoping by “many people” can be addressed, analyzed, and compared to other alternatives-the point of the NEPA process.

Comment 5: Another cause for concern we have with Alternative #5 is the seasonal variation of commercial use allocation that the Forest Service is proposing...We protest the Forest Service’s lack of straightforward language and clearly stated management objectives, which we conclude is to set commercial use allocations in the spring to a level that is met by the current allocation already used by hunting guides. We do not believe it is right for the Forest Service to effectively reserve commercial guide use for a specific user group.

Comment 27: We believe that no planning (Alternative 1) is a much better approach than reckless planning (all other alternatives)-planning that does not even identify, much less analyze, many of the resources that should be protected. This is not to say, however, that we support Alternative 1 either, because we believe that a true No Action alternative would be one that freezes the allowed use to current levels, and as a result of this freezing, no additional resource impacts would occur. To have a No Action alternative, which would allow human use to increase by 1,690% or more, borders on ridiculous.

Comment 47: I believe that all of the alternatives are unacceptable including the no action alternative. This project should not have been predicated on the assumption that if we build it they will come or that less regulation is good for the environment. It should have been based on sound science about the ecology of the area including the marine environment and the needs of not only of the visitor industry but the local economy.

Comment 92: A modification to Alternative 2 can be made to take into account use by groups at different times of the day or Groups at One Time rather than using Group Days as the basis of desirable use estimates...Not designating specific boundaries for use by large groups would allow the outfitter /guides of these groups the latitude to avoid conflicts and encounters ashore when other users are in the same Use area.

Comment 113: “Alternative 4 would provide the most opportunity for solitude because it has the lowest commercial allocation and it limits commercial use to about an average of less than 10 percent of the carrying capacity in both the spring and fall seasons.” (p.2-38) This is not true. The current condition provides the most opportunity for solitude, but it is unfairly not represented in any alternative. Alternative 4 would allow commercial use to increase to 260% of the current level, and this is certain to reduce opportunities for solitude. It could increase commercial use by 406% in the Sitka Use Area.

Appendix G—Response to Comments

Comment 132: Hunting guides have been working with the Forest Service and the State of Alaska to try to restrict and even reduce commercial pressure during the spring and fall “shoulder” seasons. To some degree these efforts have been successful. In spite of this, all of the alternatives in the draft EIS allow significant additional commercial use during these “shoulder” seasons

Comment 113: None of the alternatives will reduce user conflicts, the will increase them by adopting an overly large carrying capacity, thereby allowing numbers of group encounters to increase above current levels.

RESPONSE: The comments provided require no direct response. The comments are provided to display the breath of the comments related to the alternatives presented in the DEIS. These comments are all considered when making a final decision.

Brown Bear Management Team Recommendations

There were several comments about how the document considered the June 2000 recommendations of the Multi-agency Brown Bear Management Team (BBMT). The BBMT addressed the management of brown bears on the northern area of the Tongass. The document produced from this multi-agency effort included recommendations for all agencies and other ownerships. Examples of what was heard from comments were:

Comment 150: We had hoped that consensus finding of the broadly based group such as the BBMT would carry considerable weight with your agency and that you would see fit to incorporate much of our findings in your analysis.

Comment 18: The SE Alaska Unit 4 Brown Bear Management Strategy teams report seems to have been moved to a footnote, a mere mention in Appendix C.

RESPONSE: The BBMT developed two sets of recommendations that were submitted to the Forest Service for consideration. The first recommendations were included in a letter dated May 6, 1999 from BBMT Chair Greg Streveler to Tongass N.F. Deputy Forest Supervisor Fred Salinas. The letter provided 14 “specific recommendations for revision of the Draft Carrying Capacity Analysis and Proposed Action for the project which was then called the *“Saltwater Shoreline-based Outfitting and Guiding on the Chatham Area.”* The second set of recommendations was included in the *Southeast Alaska Unit 4 Brown Bear Management Strategy* (ABOG June 2000). Some, but not all of the recommendations from the first letter were duplicated in the second set of recommendations.

The recommendations in the June 2000 document addressed many entities including USFS, ADF&G, the public, private companies, and others. Not all of the recommendations by the BBMT were specifically addressed to the Forest Service. One example is the recommendation to the Alaska Legislature “requesting that the Big Game Commercial Services Board or an equivalent be reinstated” (ABOG June 2000, page 14). Other recommendations, such as the “siting and managing industrial camps” guidelines found on page 17 (ABOG June 2000) were not included in this EIS. There are no industrial camps proposed they are outside the scope of this analysis. Other recommendations outside the scope of this EIS included an interpretation of ANILCA Sec. 503 to require the Forest Service to complete a Comprehensive Admiralty Island Plan, to demonstrate its commitment to bear protection by providing funding to ADF&G for their brown bear studies, and consider

Response to Comments—Appendix G

restricting or prohibiting long-term camps, shore-based utilities, attachments, or other support for floating camps or lodges. Information needs for the management of resources on the forest is addressed in Appendix B of the Forest Plan. Facilities or other ground disturbing activities are not being proposed or authorized with this decision.

Most of the recommendations for Tier 1 areas were adopted and displayed in the DEIS in the Chapter 3 section entitled Brown Bear Management Strategy, and in Appendix C on pages 8-11. However, there were specific locations where authorizing officers felt that they would like to consider allowing for some uses that may conflict with the recommendations. A specific example is in Mud Bay (04-16b) where the BBMT recommended that wheeled airplanes not be allowed to land. A closure for all wheeled plane access to National Forest System lands for the general public requires a separate public notification and closure process.

Bear/Human Conflicts

Comments noting either places or conditions where bear and human interactions could be in conflict were provided, as in these examples:

Comment 150: We were disappointed to see that the concept of “Human/Bear High Use Zones” from the BBMT was given only cursory attention by the FS. [The BBMT] were at some pains to develop criteria for recognizing and managing such areas, typically important salmon streams and estuaries.

Comment 54: Brown bears are likely to be affected by hunting pressure and also by the impact of large groups on their fishing and other behavior.

Comment 8: Bears become habituated to human presence, thus increasing the chance of bear-human conflicts and leaving the bear more vulnerable to hunters

Comment 14: If large numbers of people use this road [Sitkoh Bay], there will be confrontations with and perhaps injuries from bears or bears will be shot or the bears will go away.

RESPONSE: In Appendix C, pages 10-11 discuss the mitigations required when outfitters take clients into areas where bears are known to occur. Also in Appendix C on page 8, it notes that outfitters/guides are required to include bear safety education elements to their safety plans. These elements include field sanitation, basic bear biology and behavior, how to avoid confrontations with bears in the field, viewing distances, and what to do in case of a bear encounter. Further, the mitigations proposed in the EIS also adopted the Brown Bear Management Team’s recommended criteria for Tier 1 and 2 areas. A Tier 1 area is an area with consistently good bear habitat with repetitive and frequent human use sufficient to generate immediate management concerns (amount may vary by location). A Tier 2 area is an area with consistently good gear habitat where human use is not immediately a problem but has the potential to be a problem and is approach the level of Tier 1 areas.

Appendix G—Response to Comments

Bear Habitat Concerns

Some comments noted concerns with potential impacts to bear habitat:

Comment 16: The DEIS also provides no meaningful data supporting your implied assumption that these numbers are perfectly compatible with brown bear behavior and habitat use within ½ mile of the mean high tide.

Comment 19: Since activity is concentrated near and along the rivers, impact on the wildlife (especially bears) of possible large increase in commercial use would be unacceptable.

Comment 123: Over time, the repetitive presence of people attracted to biologically rich areas, such as estuaries, will have a negative impact to the fauna in the area. For the brown bear, the estuary is food: new sedge sprouts in the spring, returning salmon in the summer and fall.

Comment 75: The EIS acknowledges that bears are displaced until people leave an area but claims that “this would be a short-term impact, amounting to a few hours per day or week and widely scattered throughout the analysis area.” This ignores the fact that habitat is not of uniform quality and that many of the “scattered” places that people congregate are critical feeding areas for bears.

RESPONSE: The discussion of brown bears was in the DEIS in Chapter 3 starting on page 104. Some minor effects on vegetation due to trampling could influence wildlife habitat. There are specific areas that could have higher or more concentrated levels of use. Also, people recreating in larger group sizes at certain times of the year, which could have more potential to affect wildlife.

The mitigations identified for the proposed activities were described in the DEIS (Appendix C beginning on page 8 and going through page 11).

Bear Hunting/Allocation Concerns

I. There were comments requesting a resolution to the brown bear allocation issue in the DEIS. Some examples include:

Comment 132: Overcrowding in the field during the spring and fall hunting season continues to adversely impact all hunting guides in GMU-4. It is unacceptable that the hunting guides, and our overcrowding issues, have been largely left out of the draft EIS.

Comment 44: I do not see anything that will protect the season and limited areas where guides can conduct bear hunts.

Comment 19: Your office said that there were complaints from guides about crowding in certain areas. You stated that these complaints came mainly from bear hunting guides/outfitters. Why not deal with just the bear hunting guides at this time.

Response to Comments—Appendix G

II. Other letters noted that an allocation for use needed to include more than brown bear hunters, as they were not exclusively using some of the Use Areas.

Comment 4: Since 1998 we have shared spring use of 04-14 with guided bear hunting parties. If we were shut out, the opportunity would most likely go to another bear hunting guide. If that happened, there would be NO spring opportunity in 04-14 for any non-hunting outfitters. The irony is that spring use limits are proposed to preserve opportunities for “solitude”.

Comment 5: We do not believe it is right for the FS to effectively reserve commercial guide use for a specific user group.

Comment 132: Conflicts between users have become a common occurrence and the quality of the experience for visiting hunters continues to decline.

III. Some comments referred to the early direction for this environmental document where the brown bear allocation was identified as a part of the decision to be made.

Comment 6: The issue of commercial brown bear guides, first identified in the original scoping and in the FS statements of “Purpose and Need”, has not been addressed. The process and criteria of how that decision will be made must be addressed.

Comment 134: We ask the FS to specifically describe in the FEIS, or in an attached appendix, the kind of process to be used to make those allocations, the timeline for the process, and what plans it has for public and agency involvement.

Comment 22: ...both the guided hunting moratoriums and repeated delays for publishing this DEIS have crippled some businesses, and have caused some to fail.

Comment 150: The decision of the FS to leave consideration of brown bear guide and hunt numbers out of the DEIS is of grave concern to the BBMT.

Comment 122: In fact, the preferred alternative would increase the amount of permits and increase the allocations on permits already in place.

RESPONSE: One initial purpose of the planning effort was to resolve the brown bear hunting management and allocation issues as noted in the Scoping Milestones in Chapter 1 on page 14. However, based on public comments received during early scoping for this analysis, it became apparent that an allocation of commercial service days could not take place without consideration of all potential commercial use during the fall and spring seasons. With this in mind, the Notice of Intent for this project was revised on April 5, 2001 to document that the final decision for this Environmental Impact Statement would not result in the resolution of a final allocation for brown bear hunts.

The Forest Service Manual (FSM 2713) directs that there shall be a prospectus to resolve allocation issues where there is a competitive interest for commercial use and where there is a limited capacity. The scope and scale of any prospectus will be considered once a level of commercial recreation use has been allocated through a decision in this document. The final decision for this document will identify the capacity for the management of all uses for each Use Area. After this decision, the

Appendix G—Response to Comments

need for a prospectus or other administration action will be considered in the management of the group days identified for each Use Area.

Another consideration is that not all hunting occurs on National Forest System lands. The State of Alaska issues annual licenses to outfitters, guides, and transporters who may not hold special use authorizations from the Forest Service. These commercial operators work below mean-high tide, or on other State lands. Though there are occasions where these uses conflict, the resolution of this issue is beyond the scope of this analysis.

As noted in the DEIS in Chapter 2 on page 4 under Fish and Game Management, outfitter/guide activities involving the taking of fish and game would be authorized under the regulations and harvest limits established by the Alaska Board of Game, Alaska Board of Fisheries, and the Federal Subsistence Board. Commercial use allocations of brown bear hunts were also addressed in the DEIS in Chapter 2 on page 43 and in Chapter 3 on pages 113-114.

In response to these comments and others regarding potential crowding or conflicts during the spring and fall seasons, the FEIS does consider reducing the number of days in the spring and fall seasons to better reflect the actual timeframes currently being used by outfitter/guides and to reduce the total number of group days identified by the recreation carrying capacity.

Seal Concerns

Examples of concerns for harbor seals are as follows:

Comment 70: The EIS fails to adequately assess and mitigate the impact of increased use on sensitive wildlife, especially harbor seals.

Comment 18: Although the FS has no jurisdiction over the intertidal lands, the DEIS should address potential seal haul-out sites, and the environment impact which groups may have going ashore in these locations.

Comment 108: ...some of the alternatives propose large group use areas, which include seal haul-outs. As mitigation you propose the NMFS guidelines for marine mammal watching. But in the case of hauled out seals, even if those guidelines were followed (staying 100 yards away), the seals will be disturbed and will rush off of the haul-out sites.

RESPONSE: The standards and guidelines for reducing or eliminating impacts to marine mammals (including harbor seals) was addressed in the DEIS in Chapter 3 on page 114 under the title of Management Indicator Species. The management of the Stellar sea lion was discussed in the DEIS in Chapter 3 on page 127, under “Endangered/Threatened Wildlife” paragraph 6.

Mitigations in Appendix C on page 7 note that activities related to marine mammals will comply with the Code of Conduct provisions in the NMFS Alaska Marine mammal Viewing Guidelines brochure. The NMFS and the Coast Guard enforce Alaska Marine Mammal Viewing Guidelines. A violation of these guidelines could result in a citation, which could jeopardize a permit holder’s ability to continue operations as an outfitter/guide through a Forest Service permit, as adherence to all Federal and State laws is one condition of the special use authorization.

Response to Comments—Appendix G

The Steller (northern) sea lion is also listed as a threatened species by the NMFS. Steller sea lions feed in the waters around the analysis area and use specific locations as rookeries or haul-outs. The NMFS identified locations as White Sisters as a critical rookery and Benjamin Island, Biali Rock, Biorka Rock, Cape Cross, Cape Ommaney, Gran (Ledge) Point, Lull Point, and Sunset Island as critical haul-outs. Twenty-seven of the 33 known Steller sea lion haul-outs in the analysis are on National Forest System lands.

Specific large group areas where comments were provided, (Damp Marker and Big Shaw Island), will be reviewed to see if further mitigations are possible or if they should be removed in the final recommendation as a large group area in the Record of Decision.

Other Wildlife Concerns

I. Several comments related to the effects of activities on other wildlife species were received:

Comment 11: Three Hill Island is inappropriate for large group areas due to the seabird rookeries.

Comment 24: damage to spawning beds and displacement of wildlife such as deer, bears, eagles and waterfowl will be the most immediately visible effects.

Comment 77: I feel that there has not been enough study on the inevitable adverse affects on wildlife and wilderness values of the area.

Comment 27: An honest assessment of the FS ability to determine ecosystem degradation for wildlife and wildlife habitat occurs in the DEIS: Wildlife population dynamics and habitat relationships are not completely understood (DEIS at 3-4). Opening up 7 million acres to exponentially increasing levels of human use with incomplete understanding of potential resource impacts opens up huge areas to potential degradation. We believe the FS needs to slow down and do its homework before considering increasing commercial use exponentially.

RESPONSE: Potential impacts to wildlife by alternative were discussed in the DEIS in Chapter 3 on pages 110-115. The discussion of the environmental consequences to wildlife habitat as specific species begins in the FEIS in Chapter 3 on page 111. Also, in Appendix C pages 5-11 Mitigation, measures were designed to reduce impacts to wildlife resources.

II. Other marine mammals were also noted in the comments as a concern:

Comment 19: Another concern I have is the increase in boat/ship traffic into Tenakee Inlet. The inlet supports a large humpback whale population with the highest concentration in the summer months. Increased marine traffic would have negative effects at the very least on our resident whales.

Comment 47: In this DEIS there is no mention of the importance of these whales and their unique group dynamics.

Appendix G—Response to Comments

RESPONSE: Mitigations in Appendix C (page 9 of the FEIS) note that activities related to marine mammals will comply with the Code of Conduct provisions and regulations in the NMFS *Alaska Marine Mammal Viewing Guidelines* brochure. The NMFS and Coast Guard enforce these guidelines. A violation of a regulation could result in a citation, which could jeopardize a permit holder's ability to continue operations, as adherence to all Federal and State laws is one condition of the special use authorization.

Fisheries Concerns

The comments received in regards to fishing seemed to focus more on how the activity was conducted instead of the impacts created through outfitting or guiding use.

I. Comments about the mitigations prescribed in the DEIS include:

Comment 34: Any educated resident of Sitka can easily discover through statistics from the ADF&G that sport fishing charter boats have a much more deleterious effect on fish resources than the traditional commercial industry.

Comment 143: Prohibitions and restrictions on guided sport fishing specifically proposed under alternatives appear arbitrary and are unnecessary for conservation reasons.

Comment 143: The analysis implies that past fishery restriction and the presence of subsistence fishing activity may have been factors in the decision but fails to identify whether other factors such as user preferences and current stock status were included in the decision. Additionally, how these factors were used in the analysis is absent.

Comment 143: The analysis explicitly refrained from allocating use between types of commercial activit[ies] but then specifically restricted guided sport fishing use in a number of area as mitigation measures under specific alternatives, i.e. 04-03, alternatives 2, 3, and 5.

RESPONSE: The effects on the fisheries resource was described in the DEIS on Chapter 3 beginning on page 120. Based partly on the response to the DEIS and after further evaluation of the fisheries resource, the FEIS will not carry forward the recommendations to limit outfitter/guides to only two guides each day for some streams on the Sitka Ranger District. The mitigation measure suggested for Redoubt Lake and Outlet Stream, Salmon Lake, Nakwasina River, St. John the Baptist River and Fish Bay River will not be included in the final document (DEIS Appendix C, page 13). Outfitter/guides fishing in freshwater will be required to report their activities to ADF&G beginning in January of 2005. The Forest Service is currently working with ADF&G to evaluate the effects of these activities on the fisheries and other associated resources.

II. In addressing outfitter/guide use of the fisheries resources, we received the following comment:

Comment 26: I watched in disgust as guided clients mishandled and needlessly killed numerous trout, Dolly Varden and salmon while their guides looked on or even took pictures and made no attempts to educate them about proper fish handling.

Response to Comments—Appendix G

RESPONSE: In Chapter 2, on page 4 of the DEIS it notes that outfitter/guide activities involving the taking of fish and game would be authorized under the regulations and harvest limits established by the Alaska Board of Game, Alaska Board of Fisheries and the Federal Subsistence Board. In the mitigations for the DEIS the first general measure says that outfitter/guide activities shall comply with all applicable federal, state, and local laws, regulations, and standards. Non-compliance with State or Federal laws could result in an unacceptable year-end performance rating that could jeopardize the continuation of a permit or the assignment of priority use. Also, depending on the severity or the violation of a State or Federal law by an outfitter/guide, a permit could be suspended, revoked or terminated. Action taken by the Forest Service to minimize unacceptable behavior in the taking of fish and game can be improved with good documentation provided to the agency from anyone witnessing this behavior. (The time and place of the infraction supported by any other documentation such as pictures or affidavits by witnesses would all help.)

III. Other protections to the fisheries resource were suggested in comments:

Comment 133: ...suggest restrictions for motorized watercraft is further developed and required for all anadromous fish streams with known fish activity.

RESPONSE: The potential impacts to fish and fish habitat is discussed in Chapter 3 pages 121-126 of the FEIS. Most transporting activity by outfitters or guides occurs within the intertidal zone and is under the jurisdiction of the State of Alaska and Coast Guard. However, if impacts from outfitter/guides authorized by the Forest Service contribute to an undesirable environmental effect, permitted use of that area could be curtailed through a decision by the District Ranger with management authority for that specific location. A finding of “effect” would likely be made by the State of Alaska prior to an initiation of action by the Forest Service. An action to restrict commercial recreation outfitters/guides would have no effect on the general public. The monitoring of fish habitat and riparian areas was discussed in Appendix D on page 4 of the DEIS.

IV. Last, was a general question regarding the fisheries habitat:

Comment 43: Will existing fish and game stocks be degraded?

RESPONSE: Chapter 3, page 121 of the DEIS noted that because of the low harvest rates projected for all alternatives in relation to the fish populations as a whole, it is not anticipated that implementation of any alternative will negatively affect fish production. Mitigations prescribed for riparian areas were discussed in DEIS in Appendix C on page 4. The monitoring of potential impacts to the fish resources was identified in Appendix D on page 5 of the DEIS. These mitigations and monitoring items are brought forward into Appendix C and D of the FEIS.

Soils and Vegetation Concerns

I. Some comments noted that increased commercial use would inevitably result in chemical (oil, gasoline, aviation fuel) spills into the marine environment and increased amounts of garbage.

Comment 134: Heavy use of (large group areas) for embarking and disembarking visitors may increase environmental degradation by repeated anchoring, trampling or accidental oil/chemical spills.

Appendix G—Response to Comments

Comment 34: Human waste, garbage, soil and plant disturbance, wildlife displacement and marine and aviation fuel and oil spillage (always possible) are just some of the very basic disturbances that groups have on an area.

RESPONSE: Oil pollution prevention measures were identified in the Mitigation Section of the DEIS Appendix C on page 4. Commercial recreation operators are subject to state and federal laws that regulate pollution on national forest lands and on marine and freshwater environments. A documented violation of any State or Federal laws by an outfitter/guide could result in a suspension, revocation or termination of a permit depending on the severity of the violation. It may also result in an unacceptable year-end performance rating that could jeopardize the continuation of a permit or the assignment of priority use. Outfitter/guide provide annual operating plans that address such issues as garbage or other items related to their activities. Not adhering to the operating plan could result in an unsuccessful year-end rating and could jeopardize the continuation of a permit or the assignment of priority use.

II. There was some concern about the introduction of noxious weeds and their control:

Comment 119: The DEIS fails to address the cumulative effects associated with the introduction of noxious weeds, such as the effects on the human environment from use of herbicides or pesticides to control such infestations.

RESPONSE: The DEIS addressed the potential for the introduction of noxious weeds in Chapter 3 on page 93 under Environmental Consequences for Biodiversity and on page 100 under Vegetation. On page 102 it notes that the cumulative effects on vegetation are not expected to be significant. A mitigation has been added to the FEIS in Appendix C under Vegetation that says, "Equipment provided by outfitter/guides or used by clients should be cleaned prior to departure in the field to minimize the potential to spread invasive weeds."

Any consideration for the treatment of noxious weeds would need additional analysis and would need to follow direction specified in Appendix C, Best Management Practices, of the Forest Plan.

III. Some discussion centered on the potential impacts to soils and vegetation:

Comment 8: Where does the DEIS define what constitutes an unacceptable level of impacts to the terrain?

Comment 41: The shoreline and grass flats are a fragile ecosystem that cannot stand up to the passage of large groups on a daily or weekly basis. Trap Bay should be eliminated from the list of large group enclaves because it has a very fragile riparian zone and wetlands and no current infrastructure is in place to minimize impacts from large-scale pedestrian use.

Comment 77: My concern is also that with a greatly increased amount of commercial usage, there will be damage to sensitive and fragile areas, such as stream banks and trails.

Comment 108: One mitigation measure that I find too strict is the measure for plants. (You) say that guides should not permit their clients to camp in beach meadows. I think this is bucking human nature, since beach meadows are highly preferred for camping. It also bucks the reality of the toughness of rye grass, the most common beach meadow plant.

Response to Comments—Appendix G

RESPONSE: Some amount of soil and vegetation degradation is an unavoidable consequence of trampling due to recreation use. Effects on soil and vegetation were discussed on pages 3-94 through 3-102 of the DEIS. Mitigation measures, such as best management practices, were described in Appendix C of the DEIS and will be carried forward into the FEIS.

IV. Other comments noted the potential need for improvements if use is accommodated:

Comment 49: A realistic analysis of the impacts of projected group use on a site-by-site basis, including projected needs for developed trails, boardwalks, docks, etc is needed.

Comment 55: When the paths become mucky and muddy from overuse and you become bombarded with complaints about it, you will have to build boardwalks and outhouses and possibly shelters.

Comment 95: Wheeled plane landings should not be permitted at all in Mud Bay. I have observed as many as seven per day during July and August in Mud Bay. The effect on soil compacting and rutting on sensitive beach areas is increasing.

Comment 112: For Mud Bay River, there is a concern that if Alt 2 is selected that not allowing motorized use of the river would cause more resource damage with more people having to hike in the riparian area.

RESPONSE: The Forest Plan considers the level of disturbance and whether or not it is significant. Impacts beyond what was anticipated in the Forest Plan as a result of outfitter/guide use could result in several actions. These include directing use to other locations, rehabilitating the impacted area or hardening the site to accommodate use. These were addressed in the DEIS in Appendix C on page 5.

V. There were several comments that noted the existence of karst in some locations:

Comment 11: Area 04-12 Trap Bay has important karst areas nearby.

RESPONSE: On page 2 of Appendix C of the DEIS it was noted that outfitters/guides will protect karst and cave resources as required by the Federal Cave Resources Protection Act (FCRPA). Cave use is not permitted without a Cave Protection Plan.

Community Concerns and Impacts

I. There were some comments related to concerns for communities and their economies. Some were general in nature as noted below:

Comment 27: It is critical for the Forest Service to take the concerns of local residents to heart because the region's economy is tied to these concerns: "A significant portion of the region's economic base is tied not to the local production of goods and services but to the choice of individuals to continue to live in small communities that are found in the analysis area. In southeast Alaska, access to the natural environment and the range of subsistence and recreation activities this access entails, is a central element in the choice of individuals to remain in the region. Consequently, the breadth and quality of recreation opportunities for local residents may be as important in generating incomes in the analysis area as are commercial tourist and recreation operations

Appendix G—Response to Comments

catering to visitors. This needs to be considered when balancing commercial and non-commercial recreation access on the national forest.” (DEIS at 3-63)

II. Other comments were specific to local communities.

Comment 3: We are strongly opposed to any commercializing of the inlet and area surrounding Tenakee.

Comment 10: As a long time Sitka and Tenakee Springs resident I am very aware of the large increase in local residents use of areas surrounding these communities. With increase in small boat ownership, etc – These areas are utilized for subsistence and recreation and could not withstand large increases in tourism uses without environmental damage and wildlife impacts.

Comment 135: The council for the city of Port Alexander requests that the US Forest Service strongly consider the southeastern Baranof Island designated zone (Use Area 04-01B) as an area significantly utilized by the local residents and the tourist industry currently in existence in Port Alexander.

RESPONSE: The DEIS addressed potential impacts of commercial outfitter/guide use on the forest to community users throughout Chapter 3 by resources but most directly pages 3-33 to 34. The proposed levels of use for commercial service providers in the DEIS are consistent with Forest Plan direction (Forest Plan Chapter 4 pages 41 to 42). Five alternatives were presented in the DEIS which provided a reasonable range of alternatives to be considered in a decision. Consideration of impacts to communities is evaluated for each alternative.

Southeast Alaska Economic Issues

I. Some comments were complimentary of some uses by commercial operators:

Comment 15: The little tour operators have been very good for the economy of Southeast, Alaska. Unlike a lot of the other larger tour companies, our passengers fly in and out of Juneau or Ketchikan, spend at least 1 or 3 days on both ends of the trip in hotels, spend money in the restaurants and still buy their mementos. I think at least they leave something positive behind.

RESPONSE: No response needed.

II. Others noted concerns for local businesses:

Comment 41: Large scale commercial recreation guiding activities on the Tongass at the levels proposed in this DEIS, directly conflict with the needs of small outfitter guides, subsistence users, and local residents. The Final EIS will serve in effect to advertise places that are currently only known and used by southeast Alaska residents and small local outfitter/guides. This will lead to an unbalanced, inappropriate level of large-scale tour operators from outside offering outfitter guide services on the north end of the Tongass. Our small local operators will be dealt a double blow – more users and hence a reduction in the isolated wilderness experience they are currently able to offer AND an unprecedented, disproportionate distribution of competition.

Comment 29: Often the larger tour operators are from out-of-state, and the presence of these large groups in an area can run out the local smaller operators.

Response to Comments—Appendix G

RESPONSE: The administration of special use authorizations is discussed in the DEIS on page 1 of Appendix C, (Mitigation). Permit holders do not have exclusive use of National Forest System lands and this is specifically noted in the permit. There may be a feeling of displacement when a site is already occupied and a non-guided group arrives. Another feeling of displacement may occur when a group occupies a site in a close proximity to another group. At no time can a permit holder ask someone to leave a site or assume that by being in “first” in a location that they can expect exclusive use.

If is competitive interest and limited commercial recreation capacity at a specific location, a prospectus could be issued requesting bids from outfitters or guides wishing to provide those services as specified by Forest Service Manual and Handbook direction. The evaluation criteria for a prospectus generally include:

1. a request for information related to past business experience,
2. an explanation of an operators experience or familiarity of the area being considered in the prospectus,
3. other factors that could benefit local guides,
4. how the commercial services would be provided,
5. the benefits to our existing permit holders, and
6. the benefits to non-guided users.

Normally the criteria is weighted to give a higher consideration for existing experience in an area, past performance of an operator and the kind of experience provided so even smaller operators who have had a successful history with their permits can be successful applicants for continued use.

Within a wilderness, the criteria in a prospectus would also include the eligibility for a preference as either a local resident or native corporation as allowed in the provisions of ANILCA Section 1307. The local preference to provide visitor services (such as sightseeing, wildlife viewing, hiking, etc) does not include outfitting or guiding for sport fishing or hunting. This preference is explained further in this section.

III. Some request a consideration for local preference in providing commercial recreation services:

Comment 39: Your lack of consideration and support for the use [of] National Forest lands in SE Alaska by non-residents and the outfitter guides industry has and will obviously continue to adversely influence our rural economies.

Comment 49: Local small-scale guides contribute to Tenakee Springs both economically and as members of the community. Their businesses depend on a low density of other users enabling them to offer a unique high-quality wilderness experience to their customers. In contrast, a shift towards large cruise ship based groups will only harm Tenakee, both by displacing local operators and by damaging non-commercial values.

Comment 53: We’d like to see a local preference for all current Tenakee permit holders. We believe that they should be given priority use designation. This is how we support the local economy.

Comment 61: Local residents should be given first preference when issuing permits in the surrounding commercial use areas (Pt. Alexander).

Appendix G—Response to Comments

RESPONSE: Since the completion of the DEIS, the agency has published final regulations in the Federal Register under ANILCA that provide a preference for Native Corporations and local Alaska residents for providing visitor services in conservation system units on National Forest System lands in Alaska. Conservation system units on the Tongass, as defined by ANILCA Section 102(4), include wilderness areas and National System Trails. ANILCA would consider this preference for Wild and Scenic Rivers as conservation system units but Congress has not yet officially designated the rivers recommended by the Forest Plan. (Recommended W&S Rivers are identified in Appendix A of the 1997 Forest Plan Record of Decision.) The local preference to provide visitor services does not include outfitting or guiding for sport fishing or hunting as excluded by ANILCA. A local preference would be used as one criterion when evaluating an outfitting or guiding prospectus where applicable.

IV. Some note that alternatives may not go as far as they should to provide for use by commercial operators (Specific to alternative or general in nature):

Comment 67: Some of our members (guided organization) have stated that they are quite concerned about the use limits that would be placed on the Pybus Bay area should alternative five be accepted. These small to mid-sized operators use shoreline within this area, and they believe the limits (in terms of clients and potential income) placed on their business would be extensive.

Comment 40: By severely, arbitrarily and unnecessarily limiting the potential for growth in the outfitter/guiding business, the Service risks transforming the experience of the Tongass into something that is open primarily to wealthy yacht owners' and local residents. At the same time the Service will stifle an important opportunity for economic growth in a region hard hit by timber industry declines.

RESPONSE: The DEIS provided a range of alternatives for consideration by the Deciding Officer (Chapter 2, pages 5 through 34). The proposed commercial recreation use meets the standards and guidelines as identified by the Forest Plan. The impacts are evaluated in Chapter 3 of the FEIS.

IV. There were some specific comments related to the information presented in the DEIS.

Comment 113: p.3-62: "Table 3-19[in the DEIS] provides some indication that tourism has effectively replaced manufacturing as the region's economic mainstay. The rapid growth in services includes many tourism related activities, is the main indicator of this replacement. Growth in proprietors' income, which includes commercial fishers but also self-employment owners of retail and service establishments, is additional evidence..."

These suggestions derived from Table 3-19 are not supported by the table or any accompanying discussion in the EIS. The services sector is a broad one, and in the table tourism is not singled out from that sector. Further, although this statement gives rapid growth in the services sector as the "main indicator" of tourism replacing manufacturing, the table clearly shows that the contribution on the services sector in the analysis is 5% lower than the sector's contribution nationally. This suggests that there is, and likely has been, room for growth in the sector regionally; however, it does not suggest in any way that tourism is though subsegment that would fill this apparent gap. The services sector, for example, includes health care, which has grown significantly in the analysis area between 1970 and 1998.

Response to Comments—Appendix G

RESPONSE: The comment points out that growth in services and related sectors does not necessarily indicate replacement of manufacturing by tourism because services and tourism are not synonymous. The same point was addressed in the following paragraph on page 3-63 of the DEIS in the text, which begins: “Tourism, however, may not be the most important source of income growth in the region.” The conclusions in this portion of the EIS are plausible and accompanied by reasonable caveats.

Also:

Comment 113: [Regarding information on page 3-64] This analysis is incomplete! Of the 433 operators, what percentage were not saltwater fishing or related services, and were “more or less evenly divided among tour operators, hunting guides, and air and sea charters. Some 433 operators were based in towns within the analysis area (including Juneau).

RESPONSE: This comment and other comments from the same letter question the utility of the Alaska State Division of Community and Business Development outfitter/guide survey data. The comments inaccurately quote the text, which claims that slightly over half of all respondents were providers of salt water fishing charters, and they fault the analysis for not providing more detail regarding the portion of the sample that operates in the planning area. The survey results were provided as background, and the data available from AK DCBD does not allow for such detail. Much of the discussion regarding the economics and trends of use on National Forest System lands was updated in the FEIS with information provided in the Forest Plan Supplemental Environmental Impact Statement of 2003.

Another comment observed:

Comment 113: p.3-66: “It is reasonable to assume that the more restrictive alternatives, to the extent that they actually do restrict future commercial activity, may also preserve recreational opportunities for local residents.”

This is not a reasonable assumption. Impacts may be reduced, but not eliminated; only some opportunities will be preserved. The potential losses are unknown because (as shown by the previous EIS paragraph) quantifying the impacts or even accurately identifying them is impossible. The keyword above is “may,” and for that reason as well, no reliance can be placed on the statement. The sentence has no value and should be stricken.

RESPONSE: This sentence will be reworded in the FEIS to note that the more restrictive alternatives might “help” preserve recreational opportunities for local residents.

Conflicts Due to Proximity to Private Inholdings

I. Some noted concerns with outfitter/guide operations near private inholdings:

Comment 31: The Forest Service appears to have adopted one commercial use policy for property on which the Forest Service owns a public recreation cabin and a totally opposite policy when it involves privately-owned cabins surrounded by Forest Service lands, which are used for the same types of recreation activities. If the Forest Service policy to ban commercial activity in a specific wilderness area due to the existence of a publicly-owned recreation cabin, that same Forest Service policy should be triggered if a privately-owned

Appendix G—Response to Comments

cabin (whose sole use is family recreation) is located in the same wilderness area, in this case the Kootznoowoo Wilderness area.

Comment 54: The DEIS fails to analyze how carrying capacities may be affected by the cumulative impacts of associated activities on adjacent lands. These include private holdings, state lands, and Forest Service timber harvest or other development. Such an analysis is crucial and must be included in the FEIS.

Comment 98: I own two parcels of land on Admiralty Island [near] Cordwood Creek. I feel that commercial guiding operations would very adversely affect our hunting, fishing, and camping in this area.

Comment 113: At least one “minimum capacity” alternative should consider the suitability of private lands in the analysis area as possible alternative locations for any commercial operators that cannot find their desired capacity on the national forest. Encouraging use on private lands should especially be considered for large groups, and certainly the national forest would serve as a backdrop for much of the trip in any event.

Comment 130: Forest Service decisions need to reflect the fact that private inholdings represent a significant non-permitted/non-regulated use of the shoreline. For example, a lodge can create a base of operation that at times dominates a bay. Non-guided hunts out of such a facility can account for a substantial use of nearby national forest shorelines. When establishing shoreline carrying capacity, it is essential to consider the effects of existing private inholdings, and those of potential inholdings that will be created by conveyance of Native allotments, most of which could become sites for lodges (three pending allotments in Mitchell Bay, one ending in Whitewater Bay, one pending in Little Pybus Bay).

Comment 150: There is inadequate discussion of the BBMT recommendation that in establishing shoreline carrying capacity, it is essential to consider the effects of existing as well as reasonably foreseeable private inholdings. The DEIS simply says, on page 3-57, that “Any additional recreational development on private lands in the future would likely increase recreation use on the adjacent national forest”. The FEIS needs to specifically indicate for each large-group area how and to what degree such private land development has influenced the large-group allocations featured in each alternative.

RESPONSE: In Chapter 3 on page 57 of the DEIS, there is discussion of cumulative effects of recreation use that considers other ownership. While the DEIS noted that a recreation development on private would likely increase recreation use on adjacent National Forest System lands, how the impact could effect the national forest is not clear. In Pybus Bay (Use Area 04-06A) an existing private lodge rents boats to their guests but no outfitting and guiding is authorized from the lodge for use of National Forest System lands. In the Hoonah area (04-11) a new tourist facility began accommodating large cruise ships in 2004 and private developments are being considered by landowners in Use Area 01-05C at Hobart Bay, and in Use Area 04-10B at Wheeler Creek. Use of National Forest System lands from these locations could only occur, if it is consistent with what is determined for a commercial recreation use level through this analysis. In Appendix C on page 2 of the FEIS, it notes that special use authorizations stipulate that outfitter/guides shall not encroach on state, state selected, or private property without prior written permission of the property owner.

Response to Comments—Appendix G

In many areas across the forest, the actual impacts are seen on the waterways through increased boat traffic. The boat traffic on the waterway is not within the jurisdiction of the Forest Service to manage. Alternatives presented in the DEIS address potential shoreline activities on National Forest System lands and the anticipated experience that are likely given the environmental, social and managerial setting. Private landholders are encouraged to work with the Forest Service when visitor services are proposed so that the development and visitor experiences compliment the objectives of both landowners. When proposed activities on National Forest System lands are not consistent with Forest Plan direction, they will not be authorized. This discussion will be broadened in the FEIS. (See Chapter 3 page 10 recreation in the Analysis Area)

II. Another request to explain effects of private land on capacities and large group areas notes:

Comment 119: We request the Forest Service explain how and to what degree private land (or State land) development has influenced or is expected to influence the proposed large-group allocations considered in this DEIS.

RESPONSE: The large group areas are proposed to accommodate existing and potential use of National Forest System lands by mid-sized cruise ships. Acres accommodating large groups were requested during the initial scoping by mid-sized ship operators currently authorized to use National Forest System lands. The Forest Plan allows this type of use.

Private landowners may accommodate large groups but, as noted, any use of private or State lands must be accomplished through a separate agreement. The use of private lands or State lands may decrease the effect of use on National Forest System lands by larger groups. However, uses of National Forest System lands very considerably to accommodate the clients or to make use of specific features in may locations so the evaluation of impacts by substituting NFS lands with private or State lands cannot be accurately portrayed.

In the DEIS in Chapter 1 on page 9 under Current and Future Projects, current activities in or adjacent to the analysis area and activities that are likely to occur in the 'reasonably foreseeable future' are discussed. Included in the list of activities considered are several State DNR management plans that have received Forest Service comment and cooperation in their development to encourage consistency in the management of adjacent lands. FSM direction encourages development on available private lands before considering the installation of facilities on the National Forest. The types of activities proposed by this analysis do not include developments (such as lodges) or other ground disturbing activities. The concept of large group areas was formed to respond to requests from mid-size tour boat operators to use the National Forest and to balance conflicts between large groups and groups of smaller size, as well as commercial and non-commercial activities.

Recreation Facility Needs

III. As noted by several comments, areas used by large groups will have to be upgraded (hardened) to prevent degradation of habitat.

Comment 55: When the paths become mucky and muddy from overuse and you become bombarded with complaints about it, you will have to build boardwalks and outhouses and possibly shelters.

Appendix G—Response to Comments

Comment 77: My concern is also that with a greatly increased amount of commercial usage, there will be damage to sensitive and fragile areas, such as stream banks and trails.

RESPONSE: Effects to forest and wetland areas from repeated use were addressed in the DEIS in Chapter 3 on pages 3-94 through 3-102. Appendices A (Use Area Cards) and B (Large Group Areas) provide site-specific data for all Use Areas within the analysis area and proposed large group sites. The monitoring of the effects of use was as described in Appendix D page 4 and in the mitigations as described in Appendix C on page 11.

IV. Some commented regarding to the perceived need for facilities to accommodate the growing outfitted and guided clients on National Forest System lands.

Comment 5: Common sense leads to the conclusion that the substantial impact of so many people going ashore regularly in an area could not be successfully accomplished without active on site management by the Forest Service, and significant site hardening to supply facilities for so many visitors.

Comment 20: The DEIS does not adequately address the inevitable effects on the ecosystem caused by large groups and multiple smaller group visits to sensitive areas.

Comment 26: Only activities that will not cause harm to the areas involved may be permitted and only at reasonable levels. Fishing, hiking and similar activities may be allowed but no development to support those activities may occur.

Comment 40a: The Forest Service should generally try to avoid encouraging large groups in bear habitat unless there have been trail improvements or there were developments in recent years, which help mitigate large group impact on bears.

Comment 49: We believe the FEIS needs to contain a realistic analysis of the impacts of projected group use on a site-by-site basis, including projected needs for developed trails, boardwalks, docks, etc.

Comment 123: Groups as large as 75 with repetitive use over an area will require types of development such as, site hardening to prevent ground disturbance, toilet facilities, and docks. The DEIS is proposing too many sites such as these, and seventy-five people imaginably will inundate an area. [We] recommend halving that number and crating two or three enclave/15% use areas in areas that have already seen site hardening such as log transfer facilities (LTFs) or roaded areas.

Comment 123: [We] have concerns about areas that have already experienced use that has contributed to trail erosion. Two trails have damage: Falls Lake in Red Bluff Bay and Cliff Lake in Deep Cove. Many boats anchor in these bays and visitors wander up to the scenic lakes. The Forest Service must either close these trails to commercial groups or do trail maintenance to prevent further degradation. Since these sites are well-used and popular, trail rehabilitation in a minimalist sense needs to be instituted before any more commercial activity occurs.

RESPONSE: The DEIS identified several locations in Appendix C where trails must be rebuilt or maintained to standard before accommodating new or increased uses. Also, the DEIS described the potential impacts to the vegetation from visitor use in

Response to Comments—Appendix G

Chapter 3 beginning on page 100 through 102. If monitoring reveals adverse effects to soil, water, or wetlands due to outfitter/guide activities approaching levels of impacts beyond what was anticipated in the standards and guidelines for the Forest Plan, commercial recreation use in these areas may be restricted and the areas re-vegetated or hardened to minimize effects (Appendix C, page 5 of the DEIS).

Information about the specific large groups is included in Appendix B of the FEIS. No additional facilities are proposed at large group locations.

Large Group Areas/Defining Large Group Use

I. Questions about the need to accommodate large groups on National Forest System lands were raised.

Comment 16: Page 3-15 suggests that such demand data does not exist for any area because it features the statement that “The largest guided group on the national forest reported in 1999 was 70 people from a tour boat. Most guided groups from tour boats range from 12 to 20 people in size.” This raises a serious question as to how, based on such a low demand for 75-person groups, can the FS propose a “preferred alternative 5” with as many as 33 large groups “enclaves” and 14 “large group 15-percent areas.”

Comment 52: In addition to the lack of any demonstrated public “need” or demand for this level of Large Group use, the DEIS lacks an adequate assessment of the effects of such group sizes on existing recreation opportunities, shoreline habitat, and the intertidal grass flats.

Comment 68: This seems like a reckless course given the difficulty of predicting impacts from such a large increase [of recreation use], and given that there is no demand for such an increase.

Comment 11: ... the Forest Service lacks actual demand data to justify this size of a group (21 to 75 people).

Comment 132: There does not appear to be an existing demand for [large group] use, rather it appears to [be] hypothetical. Because of the almost certain negative impact on bear behavior, we would recommend that justification for such large group use be provided before including this use in the EIS

RESPONSE: In Chapter 1 on page 23 and 24 of the DEIS, it was noted that large group tour operators expressed the need for more areas on the national forest where larger groups can recreate. This information was provided through the initial scoping of this document. Also, the interdisciplinary team for this project recognized that there was already some large group activity authorized in specific locations on several Ranger Districts that needed to be recognized and analyzed for this document.

In Forest Plan on pages 4-46 to page 4-52, the ROS classes are described along with Setting Indicators. One of the setting indicators is Social Encounters, which describes party sizes, as well as the encounters one could expect by ROS class. The general guidelines for the semi-primitive ROS class notes a maximum party size of generally 12-20 but then it says that outside of wilderness, larger party sizes may occur during less than 15% of the primary use season in limited locations. (In a Semi-Remote Recreation Land Use Designation, an Enclave can be established to accommodate large groups more frequently.) The accommodation of larger groups is also emphasized in Forest Plan on page 4-41 where it says that within land use

Appendix G—Response to Comments

designations LUD II, Old-growth habitat, and Semi-Remote may allowed larger party sizes in limited locations for up to 15% of the primary use season for nature-based interpretive activities if physical site conditions can tolerate it.

Questions regarding how groups may affect a use area have been updated for the FEIS. Specifically, the FEIS now notes how group use days would be calculated for large groups take advantage of large group areas and contrast this with how group days would be calculated for groups that disperse themselves in a Use Area. See Chapter 3, page 34 for this discussion.

II. There were concerns about large groups competing with other uses for the same location:

Comment 14: There are other problems which are going to have to be faced if [a] road is going to be used for large groups. For instance, right now, the Forest Service plans some logging sales...That will involve the constant movement of heavy logging equipment that under this plan will be occupied by large groups of hikers. Logging and hiking are not very compatible and hiking along a road where logging vehicles are present is asking for disaster.

RESPONSE: At the beginning of each operating season, permit holders are required to identify the places they plan to bring clients as well as to provide a safety plan that address their entire operations. Approval for commercial use by the authorizing officer is discretionary and permits can be changed to accommodate new conditions on a yearly basis to avoid potential conflicts.

III. Some questioned the application of standards and guidelines from Forest Plan in the identification of large group uses on the forest:

Comment 19: TLMP standards generally suggest commercial groups size limits of 12-20 people. This DEIS emphasizes “large groups” of 12-75 people and designating “enclaves” for large group use. Although the large groups would theoretically be confined to areas outlined on maps, if those groups are broken into smaller sub groups there are no restrictions. The “enclave” designation allows only one large group at a time in an area, but could allow for more than one group a day in that same area.

RESPONSE: In the Forest Plan on Page 1-3, under Priority of Direction it notes that the management prescription standards and guidelines for each Land Use Designation (LUD) take precedence over the Forest-wide Standards and Guidelines. In the Forest Plan on Page 3-83, the stated Goal for the Semi-remote Recreation Land Use Designation is, “To provide predominately natural or natural-appearing setting for semi-primitive types of recreation and tourism and for occasional Enclaves of concentrated recreation and tourism facilities.”

The Forest Plan LUDs for Old Growth, LUD II, and Semi-Remote Recreation, allows for some recreation development tourism accommodation in the management prescription.

IV. Some comments noted a change in experience that may occur:

Letter 15: In reading the draft and seeing all these proposed areas that would be set aside for large groups I’m shocked this would no longer be a wilderness experience.

RESPONSE: No large group areas are proposed in congressionally designated wilderness areas. Large group areas identified in the FEIS are consistent with Forest Plan land use designations. Also, the group sizes identified for each land use

Response to Comments—Appendix G

designation is consistent with the standards and guidelines provided in the Forest Plan.

One large group area was added to the pool since the DEIS was published to responded to comments. The Williams Cove Enclave was suggested as a substituted for the No Name Cove Enclave in Use Area 01-05B. Use by large groups has been allowed in Williams Cove in previous years.

V. Other comments discussed large group use based on existing uses or potential for expanding commercial businesses:

Comment 92: Linblad Expeditions has been operating in Southeast Alaska since 1982, on small expedition vessels carrying approximately 70 passengers. ...Each year between the end of May and beginning of September, the company carries approximately 1,500 passengers total on about 28 voyages on its two sister ships...Currently, the itineraries are mostly one week in duration and operate between Sitka and Juneau, so most activities are on the northern part of the Tongass.

Comment 125: In 2003 we will operate seven small ships ranging in size from 70 to 114 passengers in the area being considered by the Shoreline Outfitter/Guide EIS analysis...This definition of a large group with 75 as a maximum is concerning to us for a number of reasons,...it effectively precludes most ships of the “tour boat” class vessel from utilizing these enclave areas...We would strongly recommend that the definition of large group enclave be set at 140 so as not to preclude a majority of tour boats from utilizing these areas.

RESPONSE: This project considers groups of up to 75 people and the impacts that might occur from this potential use. Groups larger than 75 people in size (guided or unguided) would require additional analysis and approval from the authorizing officer. The discussion for large groups was updated in the FEIS to clarify how large groups will be accommodated on National Forest System lands and to better describe how the Forest Service will track potential impacts from large group use against the group use days that will be selected in final decision. (Chapter 2 page 3)

VI. One comment objected to the size of groups to be authorized for use on National Forest System lands:

Comment 113: ...other measures not addressed in the EIS: 1) consider limiting large group sizes to 12 to 20 people (as appropriate, based on the Forest Plan) rather than 75 people, except for in roaded areas with recent disturbance; 2) consider rotating enclaves annually, so that places are not committed indefinitely to large group use; and 3) Consider excluding large group areas from “Local Use Areas,” such as the Sitka Local Use Area which is a publicly identified area extending from Hoonah Sound to Windy Passage.

Comment 119: We object to the third group size used in the DEIS – groups ranging in size from 21 to 75 people.

RESPONSE: Though there are general guidelines for Primitive, and Semi-primitive ROS classes discussed in the Forest Plan, there are no maximum party sizes identified for Roaded Natural, Roaded Modified, Rural, and Urban ROS classes. The large group size of 21-75 people was based approximately on the range of people that have been commercially guided in the past and the capacity of the largest permitted operator's boat. The explanation for the development of large group areas for commercial recreation use was discussed in Chapter 3 on page 52 of the DEIS.

Appendix G—Response to Comments

VII. There were questions about the definition of large groups in this analysis:

Comment 119: The DEIS fails to specify the number of individuals comprising these groups.

RESPONSE: The Forest Plan LUD and ROS provide guidelines for group size. (See Table F-2 in Appendix F of the Shoreline DEIS). The Primitive ROS class generally has a maximum party size of 12 people. Semi-Primitive and Semi-Primitive Motorized ROS classes outside of Wilderness generally have a maximum party size of 20 people. The more developed ROS classes do not specify a maximum group size. Large groups have been further defined in this analysis for better acknowledgement and evaluation for potential impacts in Chapter 2 beginning on page 3 of the FEIS.

VIII. The impacts of different types of groups on specific areas were also brought to our attention:

Comment 14: If there is no connection between Large Group use on the road system and smaller still substantial group use on Sitkoh Creek it is not hard to envision a situation where the bay is filled with people brought by commercial operators on a continuous basis.

Comment 15: I've been in areas where these large groups have come ashore and it's not a pretty or pleasant experience. We have always enforced and maintained a "leave no trace policy" and always make every effort to become part of the environment rather than affect so we can watch bears and wildlife. I've been up a stream, watching bears, when one of these groups came ashore screaming and yelling at 25 miles per hour in their zodiacs. Needless to say the bears disappeared and we left too...I know in July and August we've pretty much given up on places like Warm Springs Bay as a couple of these operations have come in and dropped off 60 kayakers at once, it becomes a zoo.

RESPONSE: Impacts anticipated by large group use was discussed in Chapter 3 of the DEIS. In the beginning of Appendix C, general operating procedures one can expect from an outfitter/guide is provided. Monitoring of use and conditions is explained in Appendix D. Large group sizes and locations were designated according to what is consistent with Forest Plan direction.

IX. A question of how guided use would be tracked in implementation of the decision was raised:

The proposed action introduces a new limitation on outfitter/guide use, group days. But the DEIS provides no clue as to what link, if any, there might be between service days and group days, other than to suggest the average guided group size is six persons.

RESPONSE: How group days will be tracked and evaluated is better explained in Chapter 2 on page 3 of the FEIS.

Subsistence

I. We had several comments regarding subsistence. Some comments raised concerns that impacts on subsistence resources were not adequately addressed:

Comment 8: The DEIS fails to address the obvious effects on subsistence of unleashing large numbers of tourists in important hunting and fishing areas. The USFS is required by ANILCA to address the effects of its actions on subsistence

Response to Comments—Appendix G

use of resources. We request a formal hearing on the possible effects on subsistence on the proposed huge increase in commercial use of the Tongass.

Comment 122: First, I do not think the Forest Service analyzed the appropriate range of effects the plan may have on subsistence activities...Second, in order to ensure that this land use planning decision does not ‘significantly restrict subsistence use,’ the Forest Service should conduct studies regarding the subsistence use of the shoreline of the Tongass...Third, subsistence uses of the Tongass National Forest are not even analyzed by the Forest Service: data received is from the State Department of Fish and Game.”

RESPONSE: The analysis for the subsistence resources is found on pages 3-135 to 3-145 in the FEIS. The analysis in the FEIS found that none of the alternatives by themselves present a significant possibility of a significant restriction on use of subsistence resources. If resource shortages occur and restrictions are instituted to protect the resources, ANILCA provides priority for rural subsistence users. Because there was no significant possibility of a significant restriction on use of subsistence resources, there is no requirement for a formal hearing addressing possible effects.

The ANILCA 810 analysis in the FEIS focused on three factors of the subsistence resource: abundance and distribution, access to the resources, and human competition for the resources. The Subsistence Finding was presented in the DEIS on page 3-142.

The USDA Forest Service began surveys to determine “how much” of the subsistence resource is used each year in 1996. The surveys are on going and cover portions of the Forest, not just the shoreline.

The DEIS analyzed data for effects to subsistence resources from Forest Service surveys, as well as State agencies such as ADF&G, colleges and universities, and non-government organizations.

II. Other comments suggested considering ADF&G’s VCU Sensitivity analysis and identified specific areas that had high sensitivity to any kind of disturbance:

Comment 119: What is the effect of substantially increasing the level of commercial recreation use on subsistence uses in these highly sensitive areas? (Refers to ADF&G’s ranking of VCUs by sensitivity of disturbance to subsistence resources. The specific highly sensitive areas were identified as the entire western shore of Tenakee Inlet, Poison Cove, and Ushk Bay.)

Comment 131: The Forest Service should incorporate consideration of VCU’s identified by the Alaska Department of Fish and Game as especially sensitive to disturbance; all of Tenakee Inlet highest (sic) has the highest sensitivity, Pt. Adolphus, Ushk Bay, Sitka Sound, SW Admiralty, and Cape Fanshaw are sensitive areas. This is based on deer as an indicator, and there are other ecological factors that should be considered in addition. It is likely that there will be much more impact to subsistence users than acknowledged in the DEIS.

RESPONSE: ADF&G’s Value Comparison Unit (VCU) ranking is discussed beginning on page 3-139 in the FEIS. Most of the Large Group Areas on the western shore of Tenakee Inlet, with the exception of Corner Bay, and Ushk Bay received additional comments through the DEIS and were dropped from consideration as large group areas in the FEIS.

Appendix G—Response to Comments

III. Concerns were raised regarding subsistence activities and large use areas in some settings or locations.

Comment 12: I believe large group designations are incompatible with wilderness, and subsistence activities that it supports.

RESPONSE: No large group areas were proposed in any congressionally designated wilderness by any alternatives.

Also...

Comment 42: Kake uses all of our Customary & Traditional Gathering area on the East side of Baranof Island from Hazy Islands to Cape Ommaney up to Warm Springs Bay, and hunt in especially Kelp Bay with our Angoon family. Kake uses all of our Customary & Traditional Gathering area on the East side of Admiralty Island, from Pt. Gardner up the Admiralty Island National Monument coastline to Seymour Canal and Glass Peninsula. Kake uses all of our Customary & Traditional Gathering area on the main land from Thomas Bay to the North arm of Tracy Arm-Fords Terror Wilderness.

RESPONSE: The analysis for the subsistence resources is found on pages 3-135 to 3-145 in the FEIS. The analysis finds that none of the alternatives by themselves present a significant possibility of a significant restriction on use of subsistence resources.

There are no large group areas proposed on the East side of Baranof Island from Hazy Islands to Cape Ommaney up to Warm Springs Bay in any of the alternatives. There are three large group areas (two Enclaves and one Fifteen-Percent area) proposed in the Kelp Bay Use Area (04-04B) in Alternative 3; no large group areas proposed in Alternatives 4; and one Enclave in Alternative 5. There are no large group areas proposed on the East side of Admiralty Island, from Pt. Gardner up the Admiralty Island National Monument coastline to Seymour Canal and Glass Peninsula. There were nine large group areas (eight Enclaves and one Fifteen-Percent area) proposed on the mainland from Thomas Bay to the North arm of Tracy Arm-Fords Terror Wilderness in the alternatives. Williams Cove is being considered as a substitute large group area for the No Name Cove large group area based on the comments received for the DEIS.

IV. A concern was raised regarding impacts to subsistence resources and their relationship to the recreation carrying capacity analysis.

Comment 16: The DEIS is deficient in explaining how impacts on subsistence have been considered in the FS's determination of carrying capacity.

RESPONSE: The Shoreline Based Recreation Carrying Capacity Analysis for the Admiralty Island National Monument, Hoonah, Juneau, and Sitka Ranger Districts 2001 is not a decision making document; it is an assessment of the physical, social, and managerial settings of the forest and was used as a tool for determining effects in this environmental impact statement. A description of what was considered in the carrying capacity process was included in Appendix F beginning on page 10. The alternatives evaluated in Chapter 3 of the DEIS consider the effects to resources in applying various levels of commercial recreation. The subsistence resource is one of the components evaluated.

The Forest Service does not regulate the taking of shellfish. However, related concerns have been raised in the form of a proposal to the Board of Fisheries to prohibit sport fishing for shrimp and Dungeness crab. The proposal was intended to address law enforcement issues related to charter vessel operators and lodge

Response to Comments—Appendix G

owners catching shrimp and crab for their clients. Under current State law, charter vessel and lodge owners are prohibited from providing personally caught shellfish to their clients. Lodge and charter vessel owners can prepare shellfish that is legally taken by their client. This issue is related to subsistence users because some illegal activities may be reducing the amount of shellfish and crabs available and increasing competition for these resources. The Board unanimously rejected the proposal. The Board realized that enforcement is problematic; however, creating another unenforceable law probably was not the answer. Subsistence users that witness this type of activity need to report it to the proper law enforcement authorities. Shellfish harvest normally occurs below mean high tide, on lands administered by the State or under private ownership.

Questions of the Inventory Used in the Analysis

I. There were a few questions as to the quality of the inventory information being used in this analysis.

Comment 16: Changes to the EIS that would address significant issues and bring it closer in line with the BBMT's recommendations would be to ...provide definitive demand data that demonstrate why such large groups need to be authorized so often and in so many areas.

Comment 16: Moreover, the DEIS acknowledges on page 3-112 a paucity of research findings in Southeast Alaska as to the impacts of human pressure on bears along shorelines.

Comment 29: I am very concerned about the inconsistencies of data that I have found in the DEIS. In one place where a large group enclave is proposed, near Fanshaw, (Page 28 Appendix B) it says the area has not been used for commercial use, and we have been using the area for years, and paid the Forest Service for this privilege. It worries me that broad reaching decisions may be made with incomplete or inconsistent data.

Comment 33: From the non-existence of a mapped road, to the present numbers of visits by commercial tours and guides, to the level of traffic that the areas in question might support; it was clear in every case that the background facts upon which your agency is building its proposals are deeply flawed.

Comment 67: Although the [use] limits identified might ultimately be needed, there does not appear to be sufficient evidences that warrants the limits proposed.

Comment 87: The Use Area around Port Alexander is receiving more unguided recreation use than is recognized in the DEIS alternatives.

Comment 90: The FS figures that non-commercial use of the Pybus Use Area is very low in the summer... way below the overall carrying capacity. They don't say exactly what the number is, because they don't really know. My guess is that it probably averages one or fewer groups on shore per day over the course of summer.

RESPONSE: The references used for this environmental document were listed in the DEIS in Chapter 4 on pages 11 to 15. Along with this, the team used information provide from actual use reports provided by outfitter/guides.

Appendix G—Response to Comments

In the DEIS on Table 3-5 shown in Chapter 3 on page 21, the existing outfitter/guide use is provided by use area. In response to comments, the FEIS will be updated to display the average use levels for outfitter/guides from the 1999 to 2001 operating seasons rather than relying on information from the 1999 operating season. Alaska Department of Labor TRENDS data was also used to infer visitation and project future growth for this document. Information regarding outfitter/guide use near the Fanshaw area has been updated to note the existing use.

II. Some requested the Forest Service develop better methods for accounting for unguided use:

Comment 11: No figures are given for non-commercial use and it appears that there has been little research or analysis to determine what it might be, either relative to commercial use or in actual numbers.

Comment 119: The Forest Service needs to identify the steps it can take to develop reliable data on unguided use in the analysis area.

RESPONSE: Available information sources used to provide information of non-guided use on the national forest include recreation cabin reservations, State hunting and fishing records, information provided by other groups such as the Southeast Alaska Wilderness Exploration, Analysis and Discovery group who conducted studies on human/bear use at Pt. Adolphus and Lake Eva. Along with this was information provided by Forest Service personnel who work in the forest and also use it for their own recreation use. The Tongass is implementing the second Recreation Information Use Survey this year, which is a four-year effort to better understand regional trends for recreation use on National Forest System lands.

Forest Plan Consistency/Demand Analysis

I. There were questions regarding the need for a comprehensive Admiralty Island Plan.

Comment 6: The lack of a comprehensive Admiralty Island Plan is, once again, a significant factor in not knowing what the impacts of promoting use (commercial and personal) in key brown bear habitat.

Comment 150: We find no assurance in the DEIS that the FS will complete the Comprehensive Admiralty Island Plan that [was proposed by the BBMT] to resolve significant land management issues.

RESPONSE: An Admiralty Island Management Plan was completed in 1983 and amended in 1985. As noted in Forest Plan on page 1-1, the Admiralty Island Management plan was incorporated into the Forest Plan. The standards and guidelines as prescribed by the Forest Plan are applicable for the protection of the resources on Admiralty Island.

II. Some question the analysis based on using ROS and LUD designations rather than the on-the-ground site characteristics:

Comment 41: Using either [ROS or LUD] ignores the actual condition of the land, which, in several cases, is still undeveloped, unroaded and nearly pristine even in areas where the LUD or the ROS would lead one to expect otherwise

RESPONSE: A discussion of all that is considered in a ROS class designation is included in the FEIS in Chapter 3 on page 6. What was specifically considered in the development of the carrying capacity is detailed in Appendix F of the FEIS. The alternatives developed were consistent with the direction provided in the Forest Plan

Response to Comments—Appendix G

(Appendix E of the FEIS). ROS and LUD designations are management direction to achieve certain goals and objectives while allowing for a range of conditions, activities and experiences on National Forest System lands.

III. Some comments asked that this kind of analysis be applied to other areas on the Tongass for consistency:

Comment 41: This analysis includes only the Sitka, Hoonah and Juneau Ranger Districts. It should have included all Ranger Districts on the Tongass National Forest.

RESPONSE: A similar analysis was completed for the Petersburg and Wrangell Ranger Districts in 1997. This effort was documented in the 1997 Stikine Area Outfitter and Guide Environmental Assessment and was recently updated. The Misty/Ketchikan Ranger District has initiated a carrying capacity effort for several areas and projects and, a carrying capacity analysis for the ranger districts on Prince of Wales Island will likely begin once funding and personnel are in position.

IV. Some comments noted the inconsistency with Forest Plan in the identification of a large group area:

Comment 41: It's inappropriate to have a large group enclave in a LUD II because TLMP limits group size in LUD II to 50.

Comment 52: [TLMP] only defines the term “enclave” by explaining that it refers to “concentrated recreation and tourism developments.” The DEIS defines an “enclave” as “areas where large groups can occur on a regular basis through the season: “Fifteen-Percent Areas are places where large groups can occur only on an occasional basis (for less than 15 percent of the primary use season.” Clearly both Enclaves and Fifteen-Percent areas allow for “concentrated” activities. It is unreasonable for the Forest Service, however, to create a conflict or contradictory direction between the management prescription for this LUD and the ROS standards and guidelines by defining “large groups” as containing from 20 to 75 people.

Comment 119: The various LUDs adopted in (TLMP) require the Forest Service to consider a number of additional group sizes in this analysis. For some LUDs (e.g. Old-growth Habitat and LUD II), the maximum number of users per day allowed by TLMP is 50, not 75. For the Remote recreation and Wild River LUDs the maximum users per day allowed by TLMP are 24, not 75.

RESPONSE: A chart on page 4-40 of Forest Plan does identify a group of 50 as being the maximum sized group for a LUD II and Old Growth area. However, this same chart also notes that the actual numbers authorized could be larger or smaller depending on the site-specific analysis. In the LUD II and Old Growth LUDs, the only large group areas that are allowed are Fifteen-Percent areas, which means that use by large group that may affect the character of these locations can only occur 15% of the primary use season (summer)(DEIS 3-54). This calculates to about one visit per week during the summer season (DEIS 3-29). In the final FEIS, there are no large group areas considered in a LUD II or Wild River Land Use designation in any alternative.

V. Some comments question the interpretation of standards and guidelines from Forest Plan:

Appendix G—Response to Comments

Comment 52: ...there are flaws caused by the Forest Service’s incorrect interpretation and application of the standards and guidelines adopted in the programmatic revision to the Tongass Land Management Plan. These range from the failure to apply the adaptive management approach directed in the 1997 Record of Decision adopting the revised [TLMP] to errors in the description of Recreation Opportunity Spectrum (ROS) classes used in the recreational carrying capacity analysis.

RESPONSE: As defined in the Forest Plan, adaptive management is continuous process of action-based planning, monitoring, research, evaluation, and adjustment with the objective of improving implementation and achieving desired management goals and objectives. The Shoreline DEIS described and evaluated several alternatives to identify a level of commercial recreation use that would be consistent with land used designations as identified in the Forest Plan. Appendix B of the Shoreline FEIS describes the monitoring to take place, and Appendix C of the Shoreline FEIS provides a list of mitigations required to meet resource objectives. The Shoreline DEIS also notes that in the implementation of the decision, outfitter/guide activities involving the taking of fish and game will be consistent with State or Federal regulations. The implementation of all these factors is an adaptive management approach to managing commercial recreation use on the Tongass.

While the alternatives in the DEIS identify a desired outcome, if conditions change in any specific location, amendments to the EIS may be made as necessary to address those changed conditions.

VI. Some comments pointed to a deficiency in how ROS was addressed in the Forest Plan process:

Comment 52: ...the Forest Service never identified the ROS class specific to particular lands designated under TLMP. Consequently, the appropriate ROS class for particular inventoried recreation places was never subject to review and comment until this site-specific planning process.

Comment 119: Did (TLMP) assess ROS for each LUD?

RESPONSE: The Forest Plan identified a range of ROS classes for most land use designations. (Chapter 3, Forest Plan) A desired future condition for the recreation/tourism sections for the LUDs provide the direction for the management of ROS by LUD. A LUD may have several ROS classes identified depending on the use of the area, the type of facilities, or management direction. All alternatives are consistent with the direction provided by the Forest Plan.

VII. There was some question as to the application of an “Enclave” in the DEIS:

Comment 52: [TLMP] only defines the term “enclave” by explaining that it refers to “concentrated recreation and tourism developments.” The DEIS defines an “enclave” as “areas where large groups can occur on a regular basis through the season; “Fifteen-Percent Areas are places where large groups can occur only on an occasional basis (for less than 15 percent of the primary use season.” Clearly both Enclaves and Fifteen-Percent areas allow for “concentrated” activities. It is unreasonable for the Forest Service, however, to create a conflict or contradictory direction between the management prescription for this LUD and the ROS standards and guidelines by defining “large groups” as containing from 20 to 75 people.

Response to Comments—Appendix G

RESPONSE: There is a discussion of Enclave and Fifteen-Percent areas in Chapter 3 on page 35 of the FEIS. In the discussion of an Enclave, it also notes that the level of use in these locations could eventually change these locations to a more developed ROS class. In Fifteen-Percent areas, the ROS is not expected to change as use by a large group will not occur more than 15% of the primary season of use (summer).

VIII. Some commented on an underlying bias regarding the value of an individual's experience and group size:

Comment 91: ...within various parts of the national wilderness system there is a variation in the size of groups allowed (from 6 to 60)...

RESPONSE: Group size is discussed in the FEIS on page 3-15 and is consistent with direction provided in the Forest Plan.

VIII. Some commented that the number of large group areas was restrictive:

Comment 91: ...there are a number of other factors that make the designated Large Group areas that are being considered inappropriate and unnecessarily restrictive. The total area included in the Large Group areas is extremely small percentage of the entire Shoreline Zone...Designated wilderness already encompass approximately 38% of the total amount of the shoreline, and as currently regulated this shoreline would be unavailable for use by ships carrying over 12 people at one time.

RESPONSE: Large group management has been clarified and can be found in Chapter 2 on page 3 of the FEIS. Also, in Appendix F it notes that not all of the areas of the shoreline were evaluated as being suitable for recreation use. Much of the area along the shoreline is functionally less desirable for most use because of thick vegetation, wet areas, or steep terrain.

IX. Others felt the Forest Service should maintain group sizes as Forest Plan prescribes:

Comment 109: The group sizes need to remain at their current level of 4 [to] 12. If use is limited by group days there will be an incentive for groups to become large and if the groups become larger the impacts on the area will be greatly increased and the recreational experience will be greatly decreased.

RESPONSE: Group sizes of 12 or smaller are required when outfitter/guides are working in a congressionally designated wilderness. Larger groups are already using National Forest System lands and are allowed by Forest Plan and land use designation.

The possibility exists that group sizes will become larger. With this in mind, how a group day is calculated has been reassessed for the final document so that expected impacts still meet the expectations for the social environment.

X. At least one comment questioned the validity of the DEIS as a site specific document:

Comment 113: ...the Shoreline Outfitter/Guide DEIS is not an environmental impact statement. It is instead a "compliance statement" that looks at how various alternative actions will implement the Forest Plan.... essential analysis is absent! The "EIS" instead relies on the specious approach that following Forest Plan Land Use Designations and ROS guidelines assures that changes and

Appendix G—Response to Comments

impacts will be of no consequence...the “EIS” speaks of “balancing commercial and noncommercial recreation access on the national forest” (p. 3-63), but this is a farce. The balance was tipped to one side from the beginning, when it was decided to make this a plan for commercialized recreation rather than a comprehensive one that treats all recreation on equal footing.

RESPONSE: The document describes alternatives and potential impacts in Chapter 3 of the analysis. Specific information regarding each Use Area is presented in Appendix A. Specific information regarding each Large Group area is presented in Appendix B. As no specific land modifications are considered within this analysis, the consideration of impacts focus primarily on the change to the social environment. Appendix B and C address the monitoring and mitigations associated with the activities anticipated by use of National Forest System lands for commercial recreation use. There are no restrictions to general public use National Forest System lands identified within this document and potential impacts to existing uses and users are anticipated and displayed throughout the document. The alternatives developed are consistent with the direction provided by the Forest Plan. The alternatives provide commercial recreation use levels below the calculated 50% allocation to evaluate the appropriate capacity as directed by the forest plan.

XI. There was a question about why the document used a more developmental ROS class when the existing physical and social setting is relatively undeveloped.

Comment 119: The ROS Class for the Old-growth Habitat LUD is identified as “Semi Primitive.” TLMP, however, explains that this LUD “Generally provide for semi-primitive ROS setting...” TLMP at 3-80. Consequently, it is entirely possible that the site-specific analysis required for this planning decision results in a determination that a particular land area within an Old-growth Habitat LUD possesses the physical and social attributes necessary to reasonably meet the requirements for a less developed ROS classification then identified in the DEIS.

RESPONSE: In Forest Plan in Chapter 3 on page 80 under Recreation Use Administration Part B says to generally provide for semi-primitive ROS settings, recognizing that more developed settings may be present due to authorized activities, existing use patterns, and activities in adjacent Land Use Designations.

Each LUD provides guidelines and several ROS classes that TLMP identified as suitable for the LUD. For example, a wilderness LUD could be managed as a primitive or semi-primitive ROS setting and other LUDs provide for their own range of allowed ROS classes. The line officer has the discretion to manage for the range of ROS classes allowed by the Forest Plan. The intent is to provide for flexibility depending on the levels and types of activities on the landscape. (Page 8 of 2001 CC.)

XII. The consideration of the ROS inventory was brought up:

Comment 119: ...it is very important for the Forest Service to use this project level review process to address the ROS classifications for inventoried recreation places on the northern Tongass ‘independently’ of any LUD designation allocated by (TLMP).

RESPONSE: Discussion of how ROS was used for this document is explained in Chapter 3, beginning on page 6. The use of ROS for the FEIS is consistent with Forest Plan direction. Developing an ROS class independent of the Forest Plan is outside the scope of this analysis.

Response to Comments—Appendix G

XIII. Some questioned the application of ROS standards for the Tongass National Forest:

Comment 119: ROS standards were developed for conditions in the “Lower-48” and do not apply to the Alaska experience. Do the current ROS classes for TLMP accurately display the range of experiences for the Alaska Region?

RESPONSE: The ROS standards were modified in Forest Plan for Tongass conditions. Standards for “Lower 48” conditions for the Primitive and Semi-Primitive allowed for encountering 6 and 6-15 groups per day, respectively (1986 ROS Book, page IV-14). The Forest Plan adopted 3 group encounters per day in the Primitive class and 10 encounters per day (6 encounters per day in wilderness. The Forest Planning process did provide the opportunity to comment on the ROS classes and the prescribed number of encounters. This analysis is applying the range of conditions allowed in the management prescriptions. The FEIS is consistent with the Forest Plan direction in the application of the ROS for this document.

XIV. Some ROS classes in the analysis area were questioned:

Comment 40: Why are ROS classes on Admiralty Island in a Primitive class (especially on the south end), when it appears that there is enough use to justify a semi-primitive ROS class?

RESPONSE: The Forest Plan incorporated existing approved wilderness plans and adopted the ROS Classes from those plans as a part of its direction. (See page 1-1 of 1997 Forest Plan) The ROS classes in the southern end of Admiralty Island were adopted in the Admiralty Island National Monument Plan and have now been incorporated into the Forest Plan as management direction.

XV. There were some questions regarding the application of a Primitive ROS class outside of wilderness and whether or not that restricts us to the 12 person party size as is required within wilderness areas.

Comment 92: Areas outside of designated Wilderness that are designated as Primitive LUDs and Primitive ROS are basically being managed for recreation as if they were designated Wilderness; i.e., they are not available to groups over 12, and in some cases 20, further reducing to a very small area that part of the shoreline zone land which is available for outfitter/guides with groups larger than 12.

RESPONSE: There are no Primitive LUD designations for Tongass but there are Primitive ROS classes managed in a variety of Land Use Designations. The Primitive ROS setting does limit the group size to 12 persons whether it is in wilderness or outside of wilderness.

The intent of designating large group areas was to minimize conflicts with other uses, and to provide opportunities for larger groups to go ashore as one large group or as several groups all within sight or sound of each other.

In the standards and guidelines for the Forest Plan on page 4-42 under Recreation Settings A2 it says, “In Land Use Designations where non-recreation resource management activities are emphasized, manage to continue providing the current settings and opportunities until scheduled activities and practices cause a change in the ROS setting. When scheduled activities change the recreation setting, manage the new setting in accordance with the appropriate ROS guidelines.”

The Shoreline EIS is consistent with this Forest Plan direction. The capacity analysis considered existing ROS settings in the allocation of groups per day for each Use Area. Some comments questioned whether or not the area should be

Appendix G—Response to Comments

managed as a Primitive ROS setting instead of a Semi-primitive motorized setting as there are no physical features that have altered the landscape in many locations on the Tongass. The identification of the ROS class for an area includes the consideration of the environmental, social, and managerial influences in determining how an area should be managed. Many areas on the Tongass are managed as semi-primitive recreation settings primarily due to the influence of motorized traffic that may diminish a more primitive experience.

Specific direction by Land Use Designation provides a range for interpretation for how ROS might be applied. The application of ROS varies by specific LUDs throughout the Forest Plan.

XVI. There was a question about how the Forest Plan considers when a change in ROS classifications is merited:

Comment 119: ...under (TLMP), the agency is directed to manage land for the existing ROS class until use or approved activities result in changes to the ROS to a more developed classification.

RESPONSE: In the Forest Plan Standards and Guidelines on page 4-42 under Recreation Settings A2, it states, “In Land Use Designations where non-recreation resource management activities are emphasized, manage to continue providing the current settings and opportunities until scheduled activities and practices cause a change in the ROS setting. When scheduled activities change the recreation setting, manage the new setting in accordance with the appropriate ROS guidelines.”

On page 1-1 of the Forest Plan, it identifies that there were several existing wilderness plans incorporated as direction. These include wilderness plans for Admiralty National Monument, Tracy Arm/ Fords Terror, and South Baranof Wildernesses, which are a part of this analysis. With their inclusion came the adoption of ROS classes that were specifically identified as management direction. These can only be changed through a Forest Plan amendment, which is not being proposed at this time.

The alternatives are consistent with direction in the Forest Plan for the ROS classes by Land Use Designations. With the exception of Enclaves, where the ROS classification may change because of an increased level of use, there are no scheduled land management activities proposed by this analysis that will change the current settings.

XVII. There was a comment about the allocation of available carrying capacity days for commercial recreation use:

Comment 40a: What about providing commercial outfitter/guides with an opportunity to receive more than 50% total capacity through temporary use permitting.

RESPONSE: On page 4-42 of the Forest Plan, there is an allowance for the consideration of the use of surplus capacity by outfitter/guides on a temporary basis, not to exceed one year. However, the Forest Plan also notes that in general, to allocate no more than one-half the appropriated capacity of the Land Use Designation to outfitter/guide operations (4-41 Forest Plan). In specific locations different allocations based on historical use, changing demand, spatial zoning or temporal zoning can be considered. (Shoreline FEIS Chapter 3, page 28) Depending on the alternative, there are as many as nine locations where current outfitter/guide use approaching or at capacity. The Record of Decision will provide direction as to which alternative will be implemented and may also consider the allocation of the unused non-outfitted capacity.

Response to Comments—Appendix G

Making surplus capacity at specific locations available to commercial outfitter/guides on a temporary basis would be at the discretion of the District Ranger with the responsibility for managing that specific location.

Manual Direction/Legislative Concerns

I. A question about Use Areas and their perceived limits was raised:

Comment 119: While the Forest Service mentions several ‘hotspots’ where use is nearing or at capacity, the DEIS fails to inform reviewers exactly what the level of use in those areas was in 1999 or compare those to proposed levels.

RESPONSE: Page 3-46 and 3-47 of the Shoreline FEIS lists hotspots by alternative. The 1999-2001 use levels were compared to the allocations for the Use Areas by alternative to identify the locations where use is either approaching, at or over the proposed allocation.

II. There was a question of how private lands were evaluated in the DEIS:

Comment 119: We request the Forest Service explain how and to what degree private land (or State land) development has influenced or is expected to influence the proposed large-group allocations considered in this DEIS.

RESPONSE: In the DEIS in Chapter one on page nine it states that this analysis considers current activities in or adjacent to the analysis area and activities that are likely to occur in the ‘reasonably foreseeable future’. Included in the list of activities considered are several State Department of Natural Resources management plans that have received Forest Service comment and cooperation in their development to encourage consistency in the management of adjacent lands. FSM direction notes to encourage developments on available private lands before considering their installation on the National Forest. However, the types of activities proposed by this analysis do not include large developments (such as lodges) or ground disturbing activities. The large group areas were primarily established to respond to requests from mid-size tour boat operators to use the National Forest.

The Forest Service is aware of new recreation developments in Hoonah and potential developments in Use Area 01-05C at Hobart Bay and Use Area 04-04B at Wheeler Creek. While most of their proposed operations may focus on facilities on private lands, the Forest Service would review any requests for use of National Forest System lands that is consistent use levels approved through this analysis. Requests for use that go beyond what may be accommodated in this decision will require an additional environmental analysis or supplement to this decision.

III. Some comments note either a concern or preference for local hire.

Comment 4: (in regards to Use Area’s 04-14 and 04-15). Since I am a non-resident, under provisions of ANILCA, under Alternatives 2 & 5 our use would be supplanted by any additional applications for commercial use. This result would be unfair. It would negate our history of use, careful attention to the permitting process, and investment. It could very well raise constitutional issues.

Comment 53: (We would like to) see a local preference for all current Tenakee permit holders. We believe that they should be given priority use designation. This is how we support the local economy.

Appendix G—Response to Comments

Comment 61: Local residents should be given first preference when issuing permits in the surrounding corner use areas.

RESPONSE: Since the completion of the DEIS, the final rule allowing for local preference under ANILCA Section 1307 has been published. In conservation system units (As defined in ANILCA 102(b)) a preference for Native corporations and local residents to provide visitor services may be given when there is a competitive interest and a limited capacity. The preference is for providing visitor services but not for sport fishing or hunting activities where a limited capacity occurs. More information of the application of the ANILCA 1307 provision is provided in the description of the proposed prospectus for the spring and fall season included as Appendix F of the FEIS.

IV. Some comments addressed wheeled airplane access.

Letter 34: I am fully against wheeled airplane access ANYWHERE; we have enough floatplane traffic as is.

RESPONSE: National Forest System lands are opened to wheeled plane access to the general public. Allowances for motorized transportation is also provided through Section 1110 of ANILCA, which allows for airplane access into conservation system units, which include Wilderness and Wild and Scenic Rivers. Use of airplanes, like many other modes of transportation to National Forest System lands, is subject to reasonable regulation and cannot be prohibited until after notice and hearings in the vicinity affected, and there is a determination that the use would be detrimental to the resource value or unit affected. Access to National Forest System by wheeled airplane for the purpose of outfitting or guiding is left to the discretion of the authorizing officer responsible for the permitted area. An authorizing officer is normally the District Ranger who has responsibility for outfitter/guide activities on their districts.

V. A comment stated the agency was outside of its management direction:

Comment 40: [We] are concerned that the proposed action reflects a bias against public access to the Tongass that is inconsistent with both the spirit of the Alaska National Interest Lands Conservation Act, national policy directives concerning recreation on National Forest land, and the Tongass Forest Plan...Both the National Recreation Agenda and the Alaska Region Strategic Priorities recognize that opportunities for commercially guided tourism are an important component of the economies of forest dependent communities....Congress made it clear in ANILCA that it expected more—not less—public access to primitive areas in the Tongass. The proximity of the lands in the planning area to heavily traveled public waterways also argues for, if anything, a relaxation of the national ROS primitive standard.

RESPONSE: The FEIS provides for a reasonable range of alternatives, including the Proposed Action, in the consideration of commercial recreation access. The potential effects of this access to communities, the general public, and other resources are evaluated in Chapter 3.

VI. A comment about a potential large group area questioned the elimination of Williams Cove near Tracy Arms/Fords Terror Wilderness.

Comment 92: Williams Cove – This is a very desirable location for taking groups ashore and we see no logical reason for excluding the area. The Tracy Arm wilderness boundary is at closest about 1 mile from the end for the bay. The reason stated for eliminating the site is because of the proximity to Tracy

Response to Comments—Appendix G

Arm Wilderness. It seems that this argument basically amounts to arbitrarily expanding the boundaries of the Wilderness.

RESPONSE: Williams Cove has been added back into the pool for consideration as a large group area based on comments received for the DEIS. The deletion of Williams Cove as a Large Group Area, because of its proximity to the wilderness, was not consistent with Forest Service Manual Direction (FSM 2320.3(5)). Also, Williams Cove is already receiving this type of use by outfitter/guides.

VII. One comment questioned the presentation of the effects.

Comment 113: The Forest Service's gross mischaracterization of the magnitude of the project alternatives (specifically noting the characterizations of proposed commercial recreation use as compared to existing use) has seriously and unfairly skewed the entire public involvement process. This cannot be rectified without supplementing the information provided to the public and taking further comment, before and FEIS is issued.

RESPONSE: The descriptions of the alternatives and the evaluation of the effects is documented in the DEIS in Chapter 3. Included in the document was a description of current commercial recreation uses, the alternatives and potential effects.

VIII. One comment questioned the need for outfitter/guides:

Comment 113: A necessary part of my discussion is whether patrons of commercial operators have a right to use the national forest, and especially those who lack the necessary skills or equipment. These people certainly do have a right to use the forest; but there are necessary questions of what that right entails. It is not necessarily an absolute right.

RESPONSE: The Purpose and Need for this document was presented in the DEIS on page 1-3. This action is needed to meet Forest Plan goals and objectives relating to recreation, tourism, and economic support to communities; and to meet the increased demand for guided recreation while protecting the ecosystem. The authority for the issuance of outfitter/guide permits is derived from the Land and Water Conservation Fund Act of 1964.

IX. One comment noted other Forest Plan objectives and questioned whether outfitting and guiding would affect other resource objectives:

Comment 126: TLMP provides for significant opportunities to manage national forest amenities for the benefit of citizens and visitors to Southeast Alaska. TTRA (Tongass Timber Reform Act) requires meeting the demands of the forest products industry as it endeavors to rebuild itself. Forest management, including timber harvest, is very important to supplementing the village and southeast Alaska economy. Currently, village unemployment is very high largely due to the Forest Service's inability to offer economically viable sales. It is absolutely essential that the addition of an outfitter/guide program in no way hinder this requirement of TTRA.

RESPONSE: In DEIS in Chapter 3 page 151 there is the finding that notes that all project alternatives fully comply with the Forest Plan. The Forest Plan Land Use designations were discussed in Chapter 3 on page 2. A discussion of the socioeconomic affects and environmental consequences was discussed in Chapter 3 beginning on page 3-58 through 3-68.

Appendix G—Response to Comments

X. Some comments addressed the special management situation for Admiralty National Monument:

Comment 130: Under Section 503(c) of ANILCA, the U.S. Forest Service was directed to “protect objects of ecological....and scientific interest.” 16 USC Sec. 431. The legislative history of ANILCA makes clear that one of the primary resources Congress considered in giving Admiralty Island National Monument and Wilderness status was its brown bear population. Both the language of the act and the legislative history reinforce the view that Admiralty Island must be considered “special”, when it comes to brown bear management.

RESPONSE: In DEIS in Chapter 3 page 151 there is the finding that notes that all project alternatives fully comply with the Forest Plan. There is no bear habitat modified in any alternative and the Forest Service is working with State and Federal boards for acceptable bear harvest levels.

XI. Some comments responded to the need for a planning process that included communities and other input.

Comment 130: The Revised forest plan directs the Forest Service to minimize “[a]dverse impacts to popular or high-valued local areas with outfitter/guide operations” when authorizing outfitter/guide operations. (See Revised Forest Plan at 4-41, REC122 II.4(d)(2)(c)). To comply with this direction the agency should work with communities and individuals to identify these special areas and to set carrying capacity levels that respond to community and resident needs.

RESPONSE: The public process for the DEIS is described on page 1-13. A range of alternatives was provided in the DEIS for communities, agencies and interested public to respond to. All alternatives are consistent with forest plan direction.

XII. Some note our requirements under law to perform certain tasks:

Comment 143: The DEIS does not make note of the habitat designation on State lands and so raises the question of whether or not the proposed use allocations take this designation into account... NEPA requires the FS to consider cumulative actions, which when viewed with the proposed action have cumulatively significant impacts on the human environment. (see 40 C.F.R. 1508.25 (a)(2)).

Comment 16: The DEIS lacks any detail as to how the FS has prepared its shoreline carrying capacity determination in cooperation with the State of Alaska to ensure that they are complementary.

RESPONSE: Environmental effects are described in Chapter 3 of the DEIS. Discussion of the cooperation between the State and Forest Service in managing adjacent lands is noted beginning on page 1-17 of the DEIS. More is noted on page 1-19 under State Agencies. The Use Area cards in Appendix A have been revised to identify State land management objectives on adjacent lands to better illustrate the consistency of activities between both agencies.

XIII. A question of consistency with NEPA regarding potential installation of facilities was raised:

Comment 119: The draft Northern Southeast Area Plan notes that large group use areas proposed by the Forest Service are likely to have future development such as trails, mooring buoys, docks, and toilets, associated with them to mitigate the impacts of larger groups on the forest resources. The DEIS violates

Response to Comments—Appendix G

NEPA by not identifying the type, location, and effects of these reasonably foreseeable developments on the forest resources.

RESPONSE: There are no facilities proposed to accommodate commercial recreation use through this analysis. There was a list of existing facilities identified the back of Appendix C that need some maintenance or renovations before they can accommodate the guided public. The management plan for the State identifies locations where there are potential for development to ensure the land use designation for the State lands are compatible with upland ownership management. Additional analysis will still be required for any consideration of future developments on National Forest System lands.

XIV. There were questions regarding management direction vs. legislative intent for the management of some areas.

Comment 119: ...In 1989, the U.S. House of Representatives concluded that this pristine area [Goose Flats, Pt. Houghton, and others...] qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. For [this] reason [these areas] reasonably meet the physical and social setting requirements for a Primitive ROS setting.

RESPONSE: As noted in Chapter 3 on page 151, all alternatives proposed in the DEIS were consistent with other federal and state environmental laws and executive orders. The specific laws and executive orders are listed for review from page 151 through 156. The 1997 Forest Plan was developed with the consideration of all applicable laws that are in effect. Even if the area was designated as wilderness the designation of a Primitive ROS setting is not immediately conveyed. In fact, there are many portions of existing congressionally designated wilderness on the Tongass that are identified and managed as a semi-Primitive ROS class.

Capacity Analysis Comments

I. There were comments about the expectations of what the carrying capacity would provide:

Comment 8: We thought “carrying capacity” in this context would refer to a level of use that would not have significant effects on a specific area or the wildlife that relies on it.

Comment 13: I would like to bring to your attention the issue of carrying capacity, which I believe has reached an extremely crowded stage, as defined in (Carrying Capacity in Recreation Settings). This book, also referenced in letters and documents by the Forest Service, states, “if everyone feel crowded, capacity has been exceeded.” We all lost the specific recreation experience we came for.

Comment 18: Does carrying capacity reflect the actual reasonable-use acreage, or the overall determined acreage of a give area?

RESPONSE: The Recreation Carrying Capacity Analysis (RCCA) process was described in the DEIS on page 3-6 and again in Appendix F. In the discussion of the acres for the RCCA it is noted that thick vegetation, wet areas, and steep terrain were considered when looking at suitable recreation use.

Appendix G—Response to Comments

II. Questions were raised about the actual use areas used in the carrying capacity calculations.

Comment 19: The carrying capacity numbers are apparently based on assumptions about uniform use of the shoreline. Use Area 04-12 is listed with 178 miles of shoreline. Actual use is concentrated in a very small percentage of the whole area and focused on the river areas.

Comment 40: Some Use Areas ...are located along relatively protected Inside Passage routes, and contain huge shorelines and many dozens of landing sites which are accessible by skiff throughout much of the summer. Because of the size of these areas and the presence of a huge number of possible landing places...the “actual” likelihood of parties encountering other parties ashore is very low.

Comment 29: I am quite dismayed to learn that the basis for these kind of restrictions are not based on habitat carrying capacity, but rather on a more subjective basis such as “sociological expectations of what would be an optimum number of encounters.” I think that it is far too difficult to quantify a subjective experience. I would much rather see a decision based on more quantifiable data, like the amount of erosion on a trail, than on whether one person can’t stand the idea of waving at more than two other groups in a day.

RESPONSE: More specific information regarding what was considered in the carrying capacity was detailed in Appendix F of the DEIS. The text in Appendix F spoke specifically about physical limitations of the areas for use or consideration in the carrying capacity. The discussion of the social component was discussed more in Appendix F on page 12.

III. Other opinions were expressed about the capacity analysis:

Comment 40: The Shoreline Recreational Carrying Capacity Analysis is flawed, erroneously concluding that all theoretically possible group encounters actually occur. The result is a DEIS that excessively limits total recreation capacity in some areas...It seems logical and preferable that total carrying capacity should be based not on “groups at one time” but on “individuals per season.”

Comment 75: The carrying capacity analysis is based on techniques developed for trails. It fails to adequately predict encounters along the shoreline, which is what this analysis is all about...there are many reasons to think that the carrying capacity estimates are overstated. At best they are wild guesses. As the executive summary states (Executive Summary, p. xi): “Commercial recreation management at the scale proposed in this analysis is relatively new to the Forest Service in Southeast Alaska. Many of the social facets of recreation are not well understood. Recreation use levels are dynamic...Reliable site-specific unguided recreation use information is not currently available. The environmental effects of recreation use are also not well known.”

Comment 90: Ecological carrying capacity for the area will not have remotely approached....social carrying capacity for the area will not have been remotely approached because there is just no way that two or three groups per day along a 124 mile shoreline are at risk consistently getting within waving distance of one another. Ten groups could, maybe, but not two or three.

Response to Comments—Appendix G

Comment 113: The EIS does not thoroughly explore demand and creative ways to satisfy the commercial component of it. It should have, because at the root of this planning effort, demand and how to address it is a key issue that deserves debate and consideration through a broad range of alternatives.

RESPONSE: The capacity analysis was described in Chapter 3 on page 7 and in Appendix F of the DEIS. While the factors such as the limitations of the landscape, existing uses, and others were considered, it is important to note that there is also professional judgment involved as a part of the process and that some comments have expressed opinions that the total recreation capacity numbers have been either too conservative or too liberal in their application.

IV. Questions of definitions were raised:

Comment 119: What exactly does ‘optimal carrying capacity’ mean?

RESPONSE: In the recreation carrying capacity on page 11 it notes that the recreation carrying capacity can be measured at three levels: minimum, maximum and optimum. We used the optimal carrying capacity rather than a maximum capacity because it involves the concepts of quality and values along with numbers. Optimal carrying capacity may trade higher capacity numbers for other benefits. Determination of carrying capacity involves judgment and knowledge about recreation opportunities and patterns of use. Trade-offs between various opportunities and use levels is the reason why the term “optimal” was used.

V. An explanation of the evaluation of the carrying capacity analysis was requested:

Comment 130: There needs to be further explanation of how the four kinds of carrying capacity criteria – ecological, physical, facility, and social – are actually applied in the carrying capacity analysis.

RESPONSE: More specific information regarding what was considered in the carrying capacity was detailed in Appendix F of the DEIS.

VI. Some question the process for the evaluation of the carrying capacity:

Comment 138: A major deficiency in the DEIS is the lack of ability to revisit the site specific carrying capacities, to re-evaluate those that may have been incorrectly “labeled” or adjusted for cumulative impacts or adverse impacts or resource damage done by permittees. There is no specific public process to enable reconsideration for location, which is not suitable for the uses for which it is listed.

Comment 143: The “Shoreline Recreation Carrying Capacity” analysis (SRCC) done by the FS in 2001 preparatory to producing the DEIS had too little public involvement in our view. The results of the SRCC appear to drive all the allocations in the DEIS and yet, because the carrying capacities of areas were unilaterally determined by the FS in a separate document, the public and other agencies are not able to analyze or critique those carrying capacities.

RESPONSE: The public process for the capacity analysis was described on page 1-14 of the DEIS. Comments to the carrying capacity were requested during the 1998 scoping process for this analysis. As discussed in the Appendix B, monitoring of conditions will be a part of implementation of an action decision. This document will also be reviewed in approximately five years and updates or adjustments to the document decisions may be made then. The final decision does not preclude future changes or adjustments based on changed physical, social or environmental

Appendix G—Response to Comments

conditions. Any changes to an area to improve an existing facility or to propose a new facility will have its own separate analysis.

VII. There were questions about the revision of the carrying capacity:

Comment 119: We could not find a provision requiring the Forest Service to re-evaluate carrying capacities on a regular basis...The management framework adopted by the agency should clarify exactly when and how such additional analysis for the carrying capacity will be conducted. It is suggested that forest users are periodically brought together (every two years) to examine the results of monitoring the effects of its decisions to allocate shoreline carrying capacity.

RESPONSE: Unless commercial recreation and unguided use combine to cause a reevaluation of a carrying capacity at a particular location or for a Use Area, the carrying capacity is not likely to be revisited until this analysis decision is reviewed (in approximately five years). Other opportunities to revisit a carrying capacity for a specific area would be in conjunction with other activities that could result in recreation setting changes, such as timber harvest, road building, or power line installation.

VIII. A question about the seasons came up:

Comment 119: What is the basis for allocations for commercial groups in the Use Areas by season?

RESPONSE: Page 3-9 of the Shoreline DEIS provides the explanation of how the seasons were defined. The basis for allocations for commercial groups in the Use Areas by season varied by alternative but focused primarily on understanding the existing uses and considering growth that might be accommodated given the settings land the management direction.

IX. There was a question about the ecological carrying capacity:

Comment 119: Is it reasonable to assume that the ‘ecological carrying capacity’ for the analysis area is not expected to be a ‘limiting factor’?

RESPONSE: The ecological effects of the alternatives was discussed in the DEIS in Chapter 3 beginning on page 91. As there are some locations of concern, the monitoring described in Appendix C is put in place to ensure conditions stay within the anticipated impacts. The mitigations described in Appendix D will be in place to help minimize the potential effects from commercial recreation use.

X. A question of why an area with a proportion of Semi-Primitive ROS settings should be managed entirely as Primitive ROS Class.

Comment 40a: The ROS classes selected in the carrying capacity use areas picked the more conservative ROS class which effectively “rounded down” the number of groups at one time that could be in an area.

RESPONSE: The concept of carrying capacity assumes that judgment will be made concerning the various factors that are used to derive the capacity. The Forest Service selected the more conservative ROS classes where there were two or more ROS classes in a Use Area. A conservative approach was considered because we wanted to ensure a quality recreation experience, the non-commercial component of recreation use is not easy to determine, community concerns, and subsistence uses. This approach should still allow for commercial recreation growth in most Use Areas but enable us to watch the emerging use patterns and determine if additional adjustments need to be made.

Response to Comments—Appendix G

Monitoring

I. Questions were raised regarding the monitoring proposed in the DEIS:

Comment 6: The monitoring plan is not spelled out. There is a little information on what will be monitored and how monitoring will be done.

Comment 16: It is unclear in reading the DEIS how the public and agencies will be able to understand how the capacity limits will be monitored in such a way as to detect when established limits are excessive and to determine what corrective action is required.... monitoring does not appear to describe a sufficiently formalized method of testing the predicted effects once the plan is implemented... There is also a need for the FS to commit in the EIS to monitoring the impacts of high numbers of people going ashore on bear and other wildlife habitat, and for explaining exactly how the FS intends to conduct such habitat impact monitoring.

Comment 130: A monitoring plan also needs to be in place to verify assumptions used in developing carrying capacities.

Comment 143: We are pleased the mitigation section for the DEIS includes many recommendations and guidelines from the Unit 4 BBMT. However, in some cases it is not clear how the mitigation measures will be implemented. For instance, the BBMT concept of “human/bear high use zones” is included in the DEIS but no practical steps necessary to implement the concept are included. Key to implementing the tiered mitigation measures in high use zones is the need for inventorying areas likely to qualify, evaluation whether the areas meeting designation, and monitoring activity in the areas over time in order to determine when mitigation measures are required.

RESPONSE: Based on comments received in the DEIS, Appendix C was updated to be more responsive to resource monitoring needs. In particular, the monitoring of heritage resources and plants were addressed to link priorities for monitoring based on information received through the year-end actual use reports from outfitter/guides.

II. Specific items to manage were identified:

Comment 34: Human waste, garbage, soil and land disturbance, wildlife displacement and marine and aviation fuel and oil spillage (always possible) are just some of the very basic disturbances that tours have on an area.

Comment 41: Since the FS is unable to monitor current levels of use on the forest and enforce its current regulations it is illogical to propose a process that will result in permits for vast amounts of additional use... Establish a realistic, carefully planned monitoring plan and ensure reasonable long term funding for monitoring is available before implementing the program outlined in the EIS.

Comment 131: Aerial photographic surveys of boats at anchorages could be conducted as well.

Comment 133: (suggest) restrictions for motorized water craft be further developed and required for all anadromous fish streams with known spawning activity... marine mammal section of Appendix C needs to be updated to include reference to regulations that protect humpback whale from approach by vessels.

Appendix G—Response to Comments

RESPONSE: These comments, and others are being considered in the final mitigation and monitoring requirements in the final document (Appendix C and D). The guidelines for the viewing of marine mammals have been updated in the FEIS.

III. One letter commented on mitigations regarding outfitter/guide use at a specific recreation site.

Comment 138: ...White Sulphur Springs is an exceptionally rare and extremely heavily used site on the West Chichagof Wilderness (Use Area 04-15). In Appendix C, Mitigation, mitigation for this site is proposed as: “Outfitter/guide use will not displace unguided users at White Sulphur Springs Bathhouse”. But what does this mean? I presume that the immediately adjacent Forest Service cabin would not be rented to commercial users, but if groups of commercial users show up at the bathhouse, it is likely their presence would displace the private cabin users, and the cabin is rented virtually all summer season. Perhaps this unique Special Management Area should be off-limits to commercial groups.

RESPONSE: As noted in Appendix C on page 1, use of permitted areas are not exclusive for outfitters or guides and will not preclude public use or access. Reports or complaints from cabin users that their use of the White Sulphur Springs Bathhouse is being negatively affected by outfitter/guide use could lead to further restrictions for use at this location by outfitter/guides. The authorizing officer could apply additional restrictions to permit use in the form of seasonal restrictions or eliminating the site from outfitter/guide use depending on what problems are occurring. At this time, there is not sufficient documentation of conflicts at this location to warrant additional actions or restrictions for outfitter/guide use.

IV. There were some comments critical of the Forest Service's monitoring to date.

Comment 48: The Forest Service has not been adequately monitoring this activity and is likely unaware of the true level of commercial activity on the Forest.

Comment 49: The FS is incapable of adequately monitoring existing levels of use and enforcement of current FS regulations is so sparse as to be virtually ineffectual.

RESPONSE: Areas of degraded conditions are few and these areas were identified in Appendix C of the DEIS. Illegal outfitting and guiding has been successfully prosecuted over the last several years and the Forest Service will continue to pursue these actions. In addition to the efforts made by the Forest Service, other agencies such as the Alaska Department of Fish and Game, Coast Guard, and others with enforcement responsibilities provide assistance.

V. Some were critical of the monitoring as proposed and requested additional language:

Comment 49: A detailed monitoring program evaluating the impacts of public use of these areas on bears and other biota and ecosystem functions that includes a scheduled reevaluation of us based on monitoring data and public input.

Comment 149: How will use be monitored to determine whether the established limits are excessive? What and how long before corrective action is required?

RESPONSE: Some components of the monitoring and mitigations have been revised in the FEIS. Specifically, heritage resources and sensitive plant monitoring requirements note thresholds for field investigations to stay abreast of field

Response to Comments—Appendix G

conditions or to measure effects. The monitoring of the effects of this decision will be considered for all areas in the Shoreline EIS and not just large group areas.

VI. Some noted cooperation with other agencies as a component in monitoring:

Comment 54: A mitigation plan should include... A detailed monitoring program evaluating the impacts of public use of these areas on bears and other biota and ecosystem functions that includes a scheduled reevaluation of use based on monitoring data and public review...Furthermore, a monitoring program needs to be clearly laid out with mandated peer review from in-house or an Alaska Department of Fish and Game biologist at a minimum.

RESPONSE: In the DEIS on page 1-17 a discussion of the coordination process with other tribal governments and other government agencies is described in more detail.

In the DEIS in Appendix D on page 4 it was noted that monitoring included reviewing information from existing non-commercial forest use sources, such as data collected by ADF&G, National Park Service, Alaska Division of Community and Business Development, cabin use records, and observations from multi-agency personnel conducting field work.

VII. Others noted a need to monitor non-guided use:

Comment 92: ...a concerted effort could be made to determine some of the unknown variables related to recreational use in particular, such as the level of unguided recreation in the different Use Areas, and the actual extent of conflicts occurring in different Use Areas.

Comment 95: High use guided river fishing in Mud Bay Use Area 04-16(B) is significantly greater than permitted levels. Unless use is physically monitored by the USFS it is not possible to determine amount of use by any one operator.

Comment 110: ...post-season monitoring only addresses a problem after it has occurred and may not be adequate.

Comment 119: ...the monitoring program fails to address a critical issue acknowledged in the DEIS: the difficulty in quantifying the amount of unguided use occurring within the analysis area and the effects of permitted use on that use[area].

RESPONSE: As mentioned, the monitoring of resource impacts provides some relative information related to the activities of non-guided forest users. Information gathered through a cooperative venture with the Southeast Alaska Wilderness Exploration, Analysis and Discovery (SEAWEAD) organization was considered for what may be occurring near these locations.

VIII. Some suggestions for monitoring were provided:

Comment 120: ...recommend(s) making base line measurements of the campsites in the area covered by the draft EIS.

Comment 134: Monitoring of fish and wildlife needs to include more than simply reviewing harvest and use records. Areas need to be visited periodically, and systematically and use monitored to determine not only harvest affects but to evaluate disturbance effects on wildlife and habitat.

Appendix G—Response to Comments

RESPONSE: Appendix D has been updated to provide some thresholds for which use by outfitter/guides would facilitate more field investigations. The Forest Service will monitor upland use to evaluate whether or not impacts occur as anticipated. However, the monitoring of fish and wildlife populations will occur in concert with the Alaska Department of Fish and Game, and Federal Subsistence Boards.

Some baseline inventories of campsites within congressionally designated wilderness have taken place over the last couple of years and other baseline inventories may be accomplished as staffing and funding allows.

IX. We received several comments related to the relevancy of the monitoring proposed in the DEIS:

Comment 119: “Absent for the DEIS is any discussion of the effectiveness of existing or proposed mitigation measures or monitoring information to support the assumption that these measures have been effective. The list of proposed mitigation measures also fails to include any specific measures for mitigating the potential introduction of non-native plant species.”

RESPONSE: Give the size of the area, multiple access points and unregulated use by non-commercial forest users, monitoring and mitigation efforts strive to achieve and maintain conditions consistent with the uses and impacts anticipated in the Forest Plan. It is anticipated given the limited number of areas where mitigation measures are presently needed that the effectiveness of proposed monitoring and mitigations will meet our objectives as well as the standards and guidelines addressed in the Forest Plan.

The issue of non-native plant species will continue to be addressed on the Forest. There have been efforts made to inventory locations for non-native plants and to eradicate known invasive plants species as a course of forest plan direction.

Mitigation

Comments were received expressing concern regarding the effectiveness of the mitigation measures. The discussions regarding effectiveness of the mitigation measures in Chapter 2 and the Introduction to Appendix C were inadvertently edited out of the document. The Final EIS includes this discussion. If monitoring determines that a non-native plant species has been introduced onto the Forest, a project specific NEPA document would be developed. The alternatives, which could include the use of herbicides, will be assessed according to the direct, indirect, and cumulative impact on the human environment.

I. Specific comments to monitoring were as noted below:

Comment 119: “Another mitigation measure that the Forest Service should consider is temporal restrictions in areas where the DEIS proposes to authorize large and frequent shore parties. One way of doing this would be to identify certain days of the week, month, or season when large commercial shore parties would not be authorized.”

Comment 134: “A significant portion of the tideland polygons and all of the T[ideland] M[anagement] R[esource] Z[one] are designated habitat...Timing restrictions for these tidelands polygons and TMRZ areas should be incorporated into the Use Areas of the Shoreline Outfitter/Guide DEIS so the resources found there can be protected i.e. waterfowl/shorebird concentration areas, herring spawning areas, sea lion/harbor seal haul-outs, etc.”

Response to Comments—Appendix G

Comment 146: "...we recommend that the following Use Areas identified in the Draft EIS undergo further evaluation as Large Group Areas because of their high fish and wildlife values, specifically their documented importance as summer waterfowl feeding, nesting, resting, and/or molting habitat: 01-05C (Sand Bay), 04-08 (Fowler Creek), 04-12 (Crab Bay), 04-12 (West Tenakee (Goose Flats)), 04-13 (Ushk Bay), 04-04B (Cosmos Cove), 04-11 (Neka Bay North Bight), and 04-12 (Seal Bay). FWS is willing to work with USFS to help minimize potential impacts to these waterbird concentration areas as more specific proposals are developed."

Comment 125: The time of week and time of day these areas would be used by tour boat operators is very predictable and could probably be published several months in advance.

RESPONSE: Timing restrictions were not incorporated into the alternatives for several reasons. First, the size of the project area precludes such a site-specific requirements. Second, the Forest Service does not control specific scheduling of outfitter/guides as most outfitter/guides won't know their season of use until bookings are made and use levels for large groups at any location on the forest are well below suggested use levels in the EIS. Lastly, the variation of seasonal weather precludes dictating the time and place for visits in many locations on National Forest System lands.

Monitoring of use by Use Areas, including on-site inspections, should provide the feedback necessary to know whether or not the mitigations prescribed in this analysis are effective.

One of the primary reasons for developing large use areas was to inform the public and other non-guided recreationists about places where guided large uses were authorized. Under current management, guides can go anywhere on the National Forest that their permit authorizes with unlimited group sizes, as long as the group size does not exceed the ROS for that area. Large use areas were also developed in consideration of the needs of outfitter/guides. They wanted enough large use areas to provide some flexibility if weather, sea conditions, or tides required them to change their itinerary and to also ensure that multiple groups would not be in one place at the same time.

The analysis considered the Northern Southeast, the Central/Southern Southeast, and the Juneau Area Plans developed by the Alaska Department of Natural Resources and have identified the large group areas that have designated habitat in or near them. The land class recommendations from the State planning efforts are now reflected on the Use Area Cards (Appendix B). If monitoring shows that these mitigation measures do not reduce or eliminate impacts, then additional mitigation measures, such as reducing the number of commercial recreation users, will be developed in cooperation with Department of Fish and Game, Department of Natural Resources, and the U.S. Fish and Wildlife Service.

In cooperation with the USFWS, restrictions for when some areas could be used were developed (July 1 through September 15) for the Sand Bay, Fowler Creek, and Neka Bay – North Bight Large Use Areas. The intent of these restrictions is to protect molting scoters and other waterfowl that use these areas. Large Group Use in Crab Bay, Seal Bay, Goose Flats, Ushk Bay, and Cosmos Cove has been dropped due to high concentrations of breeding and nesting waterfowl.

Appendix G—Response to Comments

II. Specific comments regarding the mitigations requested by the Brown Bear Management Team recommendations were also brought forward:

Comment 8: Unfortunately, the mitigation measures regarding bears appear to have been lifted from a camper safety handbook, and do not address the larger issues.

Comment 134: “One particular disappointment is that the DEIS does not meaningfully address the major recommendations of the Unit 4 Brown Bear Management Team...The FS strongly supported the team throughout its tenure and its failure to use the opportunity of this EIS to seriously consider and implement the team’s recommendations, particularly those dealing with the limits on guided brown bear hunts and guides and on designation of human bear high use zones, is a surprise and a major disappointment.”

“We are pleased the mitigation section of the DEIS includes many recommendations and guidelines from the Unit 4 BBMT. However, in some cases it is not clear how the mitigation measures will be implemented. For instance, the BBMT concept of ‘Human/bear high use zones’ is included in the DEIS, but no practical steps necessary to implement the concept are included.”

Comment 130: “We had hoped that consensus findings of a broadly-based, expert group such as the B(rown)B(ear)M(anagement)T(eam) would carry considerable weight with your agency, and that you would see fit to incorporate much of our findings in your analysis. We were disappointed to find this to be generally not the case...Few of the team’s 14 overall recommendations or the significant issues they addressed have been dealt with adequately in the DEIS.”

Comment 16: “There appears to be no assurance in the DEIS that the FS will complete the Comprehensive Admiralty Island Plan that the BBMT proposed to resolve significant land management issues and to bring the FS into compliance with the obligation for the agency to “protect” brown bear that is described in Section 503, of the Alaska Lands Conservation Act (ANILCA).

“Similarly, the DEIS appears to afford no assurance that the FS is committed to providing funding and other assistance to the Alaska Department of Fish and Game (ADF&G) for its studies of brown bear populations, density, and behavior.

“Finally, the FS appears to have disregarded the BBMT’s recommendation that the agency restrict or prohibit long-term camps and shore-based utilities, attachments, or other support for floating camps or lodges.”

RESPONSE: Several comments raised concerns that the Forest Service either ignored or did not include all of the recommendations developed by the Brown Bear Management Team. (BBMT). The BBMT developed two different sets of recommendations. The first set of recommendations was included in a letter dated May 6, 1999 from BBMT Chair Greg Streveler to Tongass N.F. Deputy Forest Supervisor Fred Salinas. The letter provided 14 “specific recommendations for revision of the Draft Carrying Capacity Analysis and Proposed Action (for Saltwater Shoreline-based Outfitting and Guiding on the Chatham Area).” The second set of recommendations is included in the *Southeast Alaska Unit 4 Brown Bear Management Strategy* (ABOG June 2000). Some, but not all of the first set of recommendations are duplicated in the second set of recommendations.

Response to Comments—Appendix G

The recommendations in the *Strategy* were specifically addressed to multiple entities, such as resource management agencies (USFS, ADF&G, etc.), the public, private companies, etc. Some of the recommendations were not addressed to the Forest Service, such as the recommendation to the Alaska Legislature “requesting that the Big Game Commercial Services Board or an equivalent be reinstated” (ABOG, June 2000, page 14). Other recommendations, such as the “siting and managing industrial camps” guidelines found on page 17 were not included in this EIS because there are no industrial camps proposed. Other recommendations are outside the scope of this EIS. Recommendation #9 in the May 6, 1999 letter interpreted ANILCA Sec. 503 to require the Forest Service to complete a Comprehensive Admiralty Island Plan, demonstrating its commitment to bear protection by, among other things, providing funding and other assistance to ADF&G for their brown bear studies, and consider restricting or prohibiting long-term camps, shore-based utilities, attachments, or other support for floating camps or lodges.

The Interdisciplinary Team took the BBMT recommendations addressed specifically to the USFS or land/resource management agencies, determined their applicability to this project, re-wrote and summarized them as mitigation measures where possible, and included them to the greatest extent possible, as shown on the Large Use Area cards and in Appendix C. Monitoring of these locations will be in consideration of the year-end actual use reports to assist in determining high use sites for field investigations.

Heritage Resources

I. Some specific concerns were mentioned:

Comment 38: Poison Cove is also a Native Allotment of 4.3 acres. There are also cultural concerns in that area.

RESPONSE: Your comment is noted.

II. Some said the potential for adverse effects to cultural sites has not been adequately evaluated:

Comment 41: The DEIS argues that the “Area of Potential Effect” with regard to NHPA Section 106 review is limited only to large group and enclave areas. This is arguable. For example, if multiple small groups go ashore at an archeological site over the course of a short period of time, the potential for an adverse affect to that site (acute or cumulative) is no less, in reality, that if only one larger group went ashore. In fact it could be greater. Areas where repeated visits by small groups will be permitted should also be considered within the “Area of Potential Effect” and should be subject to full Section 106 Review using the same filters and parameters that are applied to large group and enclave areas.

RESPONSE: The effects to the Heritage resources are evaluated in Chapter 3 beginning on page 146 of the FEIS. The FEIS follows standards approved by the Alaska State Historic Preservation Officer and the Advisory Council on Historic Preservation. As a part of the required Section 106 review, all identified sites are evaluated against standard criteria for inclusion on the National Register of Historic Places established in 36 CFR 60.4.

III. Some question our process for addressing heritage resources:

Comment 41: The Section 106 review required of Federal actions as defined by the National Historic Preservation Act has not been completed prior to the

Appendix G—Response to Comments

publication of the DEIS....Since neither the prerequisite inventories nor the Section 106 process has been completed, the publication of the DEIS is premature. Tribes and other interested parties have not been consulted...Determinations of Eligibility and Effect have not been written and concurrence from neither the State Historic Preservation Officer nor the Advisory Council on Historic Preservation have been acquired...These processes are required by law and should have been completed prior to publication of the DEIS – especially since the results of this process determine, in part, which areas can even be included in the analysis.

RESPONSE: In the DEIS in Chapter 3 on page 143 described the tribal consultations and what has taken place in respect to the Section 106 review. The Alaska Region of the USDA Forest Service, the Alaska State Historic Preservation Officer, and the Advisory Council on Historic Preservation has established specific Section 106 procedures in a Programmatic Agreement. As part of the required Section 106 review, all identified sites are evaluated against standard criteria for inclusion on the National Register established in 36 CFR 60.4. If a site is determined to be 'eligible', a formal determination of effect must also be completed. Avoidance of sites is USDA Forest Service policy. Forest Plan direction is to identify, evaluate, preserve, and protect heritage resources on a forest-wide and project-specific level.

Other important heritage resource legislation considered in this analysis includes the Archaeological Resources Protection Act, the American Indian Religious Freedom Act and the Native American Graves Protection and Repatriation Act. Additional direction is given in the Forest Service, Manual 2360 (Special Interest Areas), and the Forest Plan to identify, evaluate, preserve and protect significant heritage resources on a forest-wide and project-specific basis.

Tribal Government consultation is described in the FEIS in Chapter 1 beginning on page 18.

Types of Access (airplanes, boats, etc.)

I. Some asked for concurrence the Brown Bear Management Team recommendations regarding limiting disruptive forms of transportation into areas of known bear concentrations:

Comment 2: In June 2000, the Southeast Alaska Unit 4 Brown Bear Management Strategy designated Mud Bay as a Tier 1 site, which recommends no....transport by airplanes, 4-wheelers, jet boats or helicopters. Yet Alternative 5 (the Forest Service preferred alternative) allows commercial airplane landings...

Comment 68: I agree with the Brown Bear Management Team that motorized use should be banned in these areas (Mud Bay as a Tier 1 area)....

Comment 75: I appreciate that the Hoonah District has considered the issues of wheeled plane access and guided river use in Mud Bay. The impacts of these activities are probably substantial on brown bears in some of their most critical habitat and must be considered in detail...There should be no airplane landings or motorboats in Mud Bay estuary.

Comment 149: No wheeled plane landings in Mud Bay. The potential impact in a Tier I bear location is huge.

Response to Comments—Appendix G

Comment 95: Wheeled plane landings should not be permitted at all in Mud Bay. I have observed as many as seven per day during July and August in Mud Bay. The effect on soil compacting and rutting on sensitive beach areas is increasing. Low level aircraft approaches and take offs completely eliminates the possibility of Brown Bear sightings and disrupts the solitude of persons who have walked in to the estuary for a couple of miles from the beach to fish...Any allowed wheel landings means unlimited landings and the attendant adverse consequences. Float plane and boat access provides very suitable access for the public.

RESPONSE: Mitigations as suggested by the BBMT were generally incorporated into the DEIS on page C-11. Some modifications of the recommendations have occurred in consideration of transportation needs to conduct activities on National Forest System lands. Specifically, in areas identified as Tier 1 areas by the BBMT, floatplane and jet boat access is allowed. While wheeled airplane access to some locations on the forest have raised some concerns about impacts to wildlife species, precluding floatplane or jetboat access to many of these locations would contradict policy for forest management emphasis to facilitate recreation use of National Forest System lands, in supporting economic opportunities, and for supporting communities.

Wheeled plane access to Mud Bay and Neka Bay was considered in the alternatives as there has been commercial recreation use providing this type of access to this specific location in the past. Public input to the continued use of this method of access for this location was requested by the District Ranger with the discretion to authorize this use. It is true that the Tier 1 mitigations recommend no plane access to Mud Bay but the consideration of the adoption of these mitigations are also subject to public review and comment. The Record of Decision will consider all the comments related to the recommended mitigations and to the use of wheeled airplane access into Mud Bay and Neka Bay.

II. The designation of an area as semi-primitive motorized brought a concern about motorized use to light:

Comment 8: There is no justification for labeling these areas (Trap Bay, Goose Flats, Saltery Bay and Seal Bay) as “motorized”, and doing so permits and invites introduction of ATVs.

Comment 48: The ROS for the Crab Bay enclave allows ATV and high clearance truck use, which is entirely wrong for the unroaded head of the bay.

RESPONSE: In Appendix F of the DEIS, there was a discussion of ROS and what each class designation encompasses. A semi-primitive motorized ROS class designation reflects the character of the setting for management purposes and helps explain the recreational experiences in that area. Off-highway vehicle use, or All Terrain Vehicle use could not occur in settings where their use would result in damage to the environment. In most cases, OHV use does not occur on most National Forest System lands as soils are sensitive or are wet in nature. There is general public use of OHVs in many locations throughout the study area but this use normally occurs where roads or abandoned roadbeds exist. Currently, there are no outfitters or guides authorized to use OHVs as a part of their operations within the project area.

Appendix G—Response to Comments

Public Process

I. Some responded that there appeared to be a predetermined outcome to the process:

Comment 5: We are well aware that one of the initial impetuses for this management plan was the need for the Forest Service to exert some limits on the excessive number of bear hunting guides that they have had previously authorized throughout the northern Tongass. It seems clear that the strategy the agency is pursuing to accomplish this is to clamp down on all commercial guide use during the spring season. The stated reason in the EIS is “to reduce encounters and provide more opportunities for solitude”. We protest the Forest Service’s lack of straightforward language and clearly stated management objectives, which we conclude is to set commercial use allocations in the spring to a level that is met by the current allocation already used by hunting guides.

Comment 132: ...it is unacceptable that the hunting guides, and our overcrowding issues, have been largely left out of the draft EIS...Now, instead of using that NEPA process (to allocate use to bear guides), the Forest Service intends to develop an administrative process, we fear that we are at risk of having our allocation successfully challenged due to being largely left out of the NEPA process. We believe very strongly that the administrative process to be used to allocate future use for the hunting guides must be clearly spelled out in the EIS and the Record of Decision, so that the administrative process, as well as our allocation, is given validity under NEPA.

RESPONSE: In Chapter 1 on page 17 of the DEIS, provides the rationale for the revised proposed action which no longer providing a direct allocation to brown bear guided hunting activities. Brown bear guided hunting is now included within the overall discussion of the commercial allocation. On page 3-113 in the DEIS, it noted that an administrative process would address the allocation of outfitter/guides to resolve outfitting and guiding issues related to brown bear hunting. Areas where commercial use may be approaching limits by alternative are identified on pages 3-46 and 3-47 of the FEIS.

II. Others questioned how some topics became a part of the consideration in this DEIS:

Comment 8: The participation in Tenakee scoping meeting for this DEIS was sparse, primarily because the “proposed action” did not give any indication of the magnitude of the shift toward large groups that is apparent in the DEIS. If the scoping notice had informed the public of possible “large group enclaves”...you may be assured that many more issues and concerns would have been identified in the scoping process. A refusal to consider (these) topics now because they were not raised during scoping would be entirely unfair...At the December 17 meeting we learned that the limit for commercial groups (ignoring the users) in the Kadashan area is 75 groups of 12 per days or 100 people. The DEIS does not begin to address the cumulative effects of that many people daily in a pristine setting, or explain how or why that number was set.

Comment 47: In May 2001, I was one of only three people in Tenakee Springs who attended a scoping meeting for the proposed Shoreline Outfitter/guide permitting program. Attendance at the meeting was unusually small for Tenakee because the notice for the meeting did not give any inkling of the scope of the subject. In fact, the notice did not even state that the meeting was part of the

Response to Comments—Appendix G

scoping process for an EIS. I was the only member of the general public at the meeting as the other two attendees were fishing guides. We thought that we were going to learn about a new process to streamline the hunting and fishing guide permit process. Both then and now I was startled to learn that the Shoreline Outfitter/Guide (Geographical Allocation System) would have a wide-ranging effect on Tenakee Inlet.

Comment 48: The DEIS is flawed in that the preferred alternative is written to address the answer to a question that was not asked. The proposed alternative presented in scoping did not include large group enclaves.

Comment 149: Big Game Hunters, Fishermen, Kayak Expeditions, and Hikers all have different needs and expectations...We believe the focus needs to be narrowed, and we question the supporting documentation that the decision to expand all commercial guiding into one category was “based upon public comment and additional analysis.”

Comment 92: ...Originally the public meetings and input into developing management alternatives was focused on hunting. It was not until later, in early 2001, that the focus of this DEIS was expanded to include all outfitter/guide activities. This has allowed relatively little time for adequate discussion and debate about the ramifications of this project to outfitter/guides not involved in hunting.

RESPONSE: The public involvement process is described beginning on page 1-13 of the FEIS. The purpose of scoping is to identify significant issues relating to the proposed action. One outcome of the scoping of the proposed action was the proposal to designate large group areas to accommodate larger tour groups. Allocation of all commercial recreation use is considered in context to the experience offered by the setting as described in the recreation carrying capacity. Recognizing that crowding and resource concerns reached beyond big game issues, the scope of the analysis was changed to address the allocation of all commercial recreation use rather than to specifically allocate use to brown bear hunters. The alternatives provide a reasonable range for the consideration of large group areas or for overall commercial recreation use.

III. Some said that the process was flawed:

Comment 123: The town of Port Alexander suffered by not having a representative from the Forest Service pay a visit to explain the DEIS.

Comment 40: The EIS for the Plan cites the use of standard ROS planning documents, including the User’s Guide and the 1986 ROS Book, both of which recite the 6-encounter standard [for wilderness]. The focus of the EIS is on the effect of the various alternatives on ROS classifications within the forest. There is nothing in the EIS to alert the reader to the fact that the social encounter standard for a ROS setting that includes the bulk of the Tongass was being cut in half. There is no discussion of this possibility in the public record prior to the publication in the final Forest Plan of the tables containing the 3 – encounter standard.

Comment 52: Although the TLMP FEIS and revised Forest Plan provide criteria for assigning ROS classes for the various LUDs, the Forest Service never identified the ROS class specified to particular lands designated in TLMP. Consequently, the appropriate ROS class for particular inventoried recreation

Appendix G—Response to Comments

places was never subject to review and comment until this site-specific planning process...The Forest Service needs to provide this critical information and give reviewers the opportunity to comment on the appropriateness of specific ROS classifications that the agency intends to apply.

RESPONSE: The Shoreline environment analysis has followed Forest Service Manual procedures and Forest Plan direction. The Forest Plan described the application of ROS Class settings and evaluated the impacts in the FEIS. Land Use Designations identified the type of changes that might occur over time. Not all resource layers were provided in the final map package for the Forest Plan (ROS maps was one of them). The process for this analysis was detailed in Chapter 1 of the DEIS.

IV. Others suggest we not complete the FEIS until more work is done with stakeholders:

Comment 46: ...what I am suggesting is that the Forest Service delay issuing the FEIS and create a stakeholders task force to review and modify this proposed Outfitter/Guide management plan to that in the end you will have a plan that actually reflects the needs of the region.

Comment 138: The Forest Service has not attempted any known coordination to date with the Sitka Coastal Program to ensure its Special Management Areas are adversely impacted to the minimum extend possible.

RESPONSE: The Public Involvement process for this analysis is documented in Chapter 1 of the FEIS beginning on page 13. Comments regarding land use management were taken into consideration during the forest planning process. Stakeholders have provided input to this analysis either directly or through the groups they choose to represent them. Contacts with specific organizations or agencies are documented in the planning record and available if requested. This analysis seeks to implement the forest plan direct.

V. Some questioned the process itself:

Comment 110: There had previously been promised that the FS would hold a meeting in the summer of 2001 (in Tenakee), but this never occurred. When the May, 2001 meeting occurred, the City of Tenakee sent a letter to the FS stating that advertising for the meeting didn't adequately state that it was intended for more than outfitter-guides, or that more than o/g's might be affected by the decision. It missed reaching the general public.

RESPONSE: In addition to public meetings for scoping and for comments as documented in Chapter 1 of the DEIS beginning on page 13, there were newsletters mailed to interested parties on three occasions to updating interested parties of the project status and to encourage feedback.

VI. Some noted that there were enough flaws to support a supplemental DEIS.

Comment 131: One of the problems with this document is that it is tiered to an earlier document that defined capacity, but that document was never released to the public as a range of capacity alternatives for public comment...The Forest Service has not demonstrated demand, capacities could be to high, and the Forest Service is not keeping options open.

RESPONSE: The process for the capacity analysis is noted in Chapter 2 on page 1. The carrying capacity was included for comments in the 1998 scoping of the proposed action for this analysis as noted in Chapter 1 on page 14 of the DEIS.

Response to Comments—Appendix G

VII. One question asked when the carrying capacity might be revisited:

Comment 119: We could not find a provision requiring the Forest Service to re-evaluate carrying capacities on a regular basis.

RESPONSE: The Decision Framework identified in Chapter 1 on page 4 now notes that the decision for this analysis may be reviewed in five years. The review of this decision most likely would include a review of the carrying capacity analysis.

Guide Allocation Issues

I. There were some questions regarding the types of guides getting allocated use on National Forest System lands:

Comment 13: After exploring and outfitting in Alaska for over 22 years I have watched the large increase of permits given to Cruise Ships without any research of their impact. The High volume is destroying both the primitive experience and the fragile ecosystem by putting such large numbers of people in this area all at once.

Comment 16: The FS seems to have ignored the significant issues that were identified by bear hunting guides, a variety of other interests, and the agency itself. One of these issues is excessive competition between bear hunting guides in Game Management Unit 4 (GMU4) and the need for the FS to adopt a more conservative policy for issuing brown bear guide permits on national forest land...A major deficiency of the DEIS is that the FS has lumped all guiding into one use category, so that the number of hunts or number of guides is not addressed at all.

Comment 32: Carrying capacity for Pt. Adolphus should not be allocated to kayak guides only. This area is a central transiting east/west corridor for transportation...Bear hunters and bear guides cannot have use of hot spot areas for bears in the spring. Bird viewing is excellent during spring migration.

Comment 52: There is no mechanism for keeping groups apart, spreading use out evenly over a given season, or preventing all allowable groups from using the same area at one time. The DEIS doesn't even address the social impacts of encountering a group of 50 versus a group of 5, or of encountering 6 groups versus 1 group.

Comment 54: I believe the FEIS needs to contain ways to limit large group use to certain days of the week so that other users may choose other days to visit an area...A better analysis of use, perhaps dividing usage into guided hunts, guided fishing in streams, guided wildlife/wilderness viewing, groups interested in somewhat isolated or "semi-primitive" wilderness experience, large groups, and very large groups.

Comment 120: We believe that educational permits for the forest should be considered and then have separate allocation numbers.

Comment 131: We believe the range of alternatives should include an alternative with a different management system, similar to that used for commercial halibut fishing, in which a set number of operators is permitted by operation size and area.

Appendix G—Response to Comments

Comment 132: The Forest Service has a legal mandate to protect permitted historical use of priority users against displacement by non-priority permittees.

Comment 138: The current DEIS gives no guidance to managers on how to allocate between various types of uses or specific locations for the most part when issuing specific permits. This issue has large implications for other uses since brown bear hunting is basically incompatible with any other uses in the same location at the same time.

RESPONSE: In Forest Service Manual 2713 direction is provided that notes where there is a competitive interest and a limited capacity a prospectus shall be issued to determine the allocation of commercial recreation use. As expressed in the previous statements, there are a variety of interests represented who have concerns regarding the allocation process. Depending on the Selected Alternative for this analysis, some additional work will be required for allocation of uses in some locations.

The establishment of Enclaves was one method for attempting to let different user groups know about locations where large groups might be encountered. Actual year-end use reports provided by the outfitter/guides will be one tool used to clarify use patterns to see whether or not we can anticipate conflicts at specific sites.

II. There were questions about allocations based on a preference for existing permit holders:

Comment 40a: ...we are concerned that limited number of permits for “group days” may be issued based upon some kind of historical preference. Obviously, the Tlingit people were here first, and some tour companies have been in business longer (than us). Will these entities be offered priority allocations? If so, how much? Will Alaska based companies be offered priority allocations? If so, how much? The questions need to be answered sooner, rather than later...

Comment 41: ...this DEIS does not take into account the needs, demands and impacts of current and future small outfitter guides and instead has, created an administrative atmosphere in which the needs of large-scale operators will supercede all others.

Comment 123: If (the carrying capacity) does reach maximum, the Forest Service needs to illuminate how the permits are to be administered, i.e. who gets priority, limits to how many each operator is allowed, assurances that small local business owners will have access to areas they need, etc...Since the USDA supports small business in rural communities, a preferential permit system to small-scale local commercial guides is a way to encourage development and sustainability of rural communities.

RESPONSE: Since the close of the comment period for the DEIS, the Forest Service has issued a rule implementing a priority for local residents and native corporations providing visitor services in conservation system units. (Current conservation system units on the Tongass are wilderness areas.) If it is determined a prospectus is needed for outfitting and guiding services, a preference for local businesses and native corporations would be a part of the evaluation criteria when considering an allocation for services within a wilderness area. Sport fishing and hunting services are not included in this preference. Visitor service activities would include, but not be restricted to, wildlife viewing, nature tours, viewing scenery, etc.

Response to Comments—Appendix G

III. Some question the amount of allocation to go to outfitter/guides.

Comment 40a: The Forest Plan requires the Forest Service to “generally allocate no more than one-half the appropriate capacity of the Land Use Designation to outfitter/guide operations on an administrative area basis”, and since much less than 50% of the appropriate capacity of the Wilderness Area LUDs on the Sitka District have been allocated to outfitter/guide operations, it is not inappropriate for Use Areas like Gut Bay to receive more than 50%.

Comment 121: There should likewise be provision to ensure re-allocation of unused commercial allocation within the commercial sector (i.e. from one outfitter/guide to another outfitter/guides) before it is reallocated for use by unguided recreationists.

RESPONSE: As mentioned in the Purpose and Need on page 1-3 of the DEIS, the intent of the analysis is for management to provide a balance for commercial and non-commercial recreation opportunities and reduce the potential for user conflicts. Unused portions of commercial recreation use allocations are identified annually and may be available for redistribution to other commercial operators up to the levels approved by the Record of Decision. Unused portions of non-commercial recreation capacity may be available for commercial use on a temporary annual basis at the discretion of the authorizing officer as provided in the Forest Plan.

IV. Un-permitted guided use is also a concern:

Comment 129: ...the Forest Service should be more concerned about un-permitted guided groups.

RESPONSE: The Forest Service law enforcement officers and State Troopers have cited several un-permitted guided groups over the last several years and will continue to pursue other cases, as they are known.

V. There were questions of the allocation process in places where the allocation may be met:

Comment 119: Although the DEIS identifies “hotspots” where there are existing perceptions of overcrowding and the possibility of reductions in unguided recreation use if total carrying capacity is neared or reached, no explanation is provided about how these problems will be addressed when or if they arise.

RESPONSE: This issue was generally addressed in the Environmental Consequences section of the DEIS. Chapter 3 on page 27 discusses situations when unguided use increases to a point where, when combined with the commercial use, the total carrying capacity for this alternative would be met or exceeded. At that time, the recreation carrying capacity would be reviewed. The outcome could either be a reclassification of the ROS to less primitive classifications (allowing for more encounters), or to implement some management control over the site for all users.

A change in the FEIS from the DEIS will reflect the fact that another option may be to reduce the commercial recreation use to maintain the setting and experience desired for the ROS class of freeze use at existing levels. If there is a competitive interest at the lower use levels a prospectus would have to be issued to allocate the use at these locations.

VI. There were comments regarding the allocation of the carrying capacity to the guides where general public use does not meet the recreation carrying capacity.

Comment 40a: The selected alternative should allocate 60% (sixty percent) of total capacity to commercial use, and it should acknowledge that commercial

Appendix G—Response to Comments

outfitter/guides may be given an opportunity to receive more than this amount through temporary use permitting where surplus capacity is not being used by the general public.

RESPONSE: Forest Plan standards and guidelines note to generally allocate no more than one-half the *appropriate* capacity to outfitter/guide operations. Before considering allocating up to 60% of the total recreation capacity to outfitters or guides, there must be a decision on the appropriate capacity for managing commercial recreation use. The current actual use levels for outfitter/guides are considerably lower than the estimated total capacity and growth for commercial operations can be accommodated by all alternatives (See Chapter 3, page 40).

ROS Clarification

The questions about the Recreation Opportunity Spectrum generated a lot of comments.

I. Some were interested in specific designations for ROS classes on areas or specific sites on the Tongass:

Comment 7: I feel it is also very important to record and request “primitive” designations for pristine areas, especially those that are now roadless...If we are stuck with the ROS system we want to register strong objections to the way it has been applied to Tenakee Inlet watersheds. We object strongly to the use of the “semi-primitive motorized” designation in Trap Bay, Goose Flats, Saltery Bay and Seal Bay....The use of boats to access state controlled tidelands in no way justifies categorizing adjacent lands as “motorized”.

Comment 24: I am disturbed about the ROS designations in the use area card. In the West Tenakee Large Group Area map for instance, the entire Middle Goose Flats is designated as the large group area boundary. Is that also the ROS Boundary? If that is the case then an awful lot of the area will be subjected to heavy use. This area is used extensively by sport and subsistence waterfowl hunters, and the proposed large tourist impact would make that kind of use impossible.

Comment 27: We believe no exceptions should be created to the Forest Plan to allow more visitation than existing ROS guidelines: a maximum group size of 20 in Semi-Primitive ROS areas and a maximum of 12 people in Primitive ROS areas.

Comment 40: Had the Service correctly applied the semi-primitive motorized classification to the area within ½ mile of the beach, carrying capacity would have been determined to be more than three times higher than assumed by the authors of the DEIS...Even if the authors had correctly applied the ROS system to arrive at an appropriate number of social encounters (and they did not), by failing to make allowance for the typically short duration of visits ashore on the Tongass they further systematically underestimated carrying capacity.

Comment 40a: ROS Class standards provide guidance on group size limits, yet the DEIS fails to provide maps of the various ROS Class locations within the study area.

Response to Comments—Appendix G

RESPONSE: The standards and guidelines for the application of ROS classes on the Tongass National Forest were presented in Appendix F of the DEIS. The application of ROS classes in this project is consistent with the Forest Plan direction.

II. Others questioned the application of ROS to the Tongass:

Comment 8: It seems like a mistake to try to shoehorn the Tongass into planning categories developed for Lower 48 forest with much high densities of people and roads, few pristine areas, and much lower expectations.

Comment 9: This whole ROS concept is new to the Tongass and may not be as appropriate or as applicable as it is in Southern States.

Comment 52: The ROS standards were developed to National Forests in heavily roaded and populated areas that are very dissimilar to the Tongass NF...Since the Forest Service's responsibility essentially ends at the mean high tide line, I disagree very strongly that it is appropriate to reduce the ROS class for a particular location from primitive or semi-primitive non-motorized to semi-primitive motorized simply because the typical means of transportation to access points to most recreation spots within the planning area is by motorized boat...I recommend that in adopting ROS classifications for this project, the Forest Service err on the side of protecting the type of recreation opportunity that most visitors and residents wish to experience-the least developed ROS classification permissible.

Comment 40: There is nothing in the EIS to alert the reader to the fact that the social encounter standard for a ROS setting that includes the bulk of the Tongass was being cut in half.

Comment 119: ROS standards were developed for conditions in the "lower-48" and do not apply to the Alaska experience. Do the current ROS classes for TLMP accurately display the range of experiences for the Alaska Region?

RESPONSE: The ROS standards were modified in Forest Plan for Tongass conditions. Standards for "Lower 48" conditions for the Primitive and Semi-Primitive allowed for encountering 6 and 6-15 groups per day, respectively (1986 ROS Book, page IV-14). The Forest Plan adopted 3 group encounters per day in the Primitive class and 10 encounters per day (6 encounters per day in wilderness. The Forest Planning process did provide the opportunity to comment on the ROS classes and the prescribed number of encounters. This analysis is applying the range of conditions allowed in the management prescriptions. The FEIS is consistent with the Forest Plan direction in the use of ROS for this document.

III. Some question the application of ROS standards in parts of the Forest:

Comment 119: The ROS Class for the Old-growth Habitat LUD is identified as "Semi Primitive." TLMP, however, explains that this LUD "Generally provide for semi-primitive ROS setting..." TLMP at 3-80. Consequently, it is entirely possible that the site-specific analysis required for this planning decision results in a determination that a particular land area within an Old-growth Habitat LUD possesses the physical and social attributes necessary to reasonably meet the requirements for a less developed ROS classification then identified in the DEIS.

RESPONSE: Forest Plan Page 3-80 under Recreation Use Administration Part B says to generally provide for semi-primitive ROS settings, recognizing that more developed settings may be present due to authorized activities, existing use patterns, and activities in adjacent Land Use Designations.

Appendix G—Response to Comments

Each LUD provides guidelines and several ROS classes that the Forest Plan identified as suitable for the LUD. For example, a wilderness LUD could be managed as a primitive or semi-primitive ROS setting and other LUDs provide for their own range of allowed ROS classes. The line officer has the discretion to manage for the range of ROS classes allowed by the Forest Plan. The intent is to provide for flexibility depending on the levels and types of activities on the landscape. (Page 8 of 2001 CC.)

IV. There was a question about how the Forest Plan considers changes to ROS classifications:

Comment 119: ...under (TLMP), the agency is directed to manage land for the existing ROS class until use or approved activities result in changes to the ROS to a more developed classification.

RESPONSE: In the Forest Plan on page 4-42 under Recreation Settings A2, it states; “In Land Use Designations where non-recreation resource management activities are emphasized, manage to continue providing the current settings and opportunities until scheduled activities and practices cause a change in the ROS setting. When scheduled activities change the recreation setting, manage the new setting in accordance with the appropriate ROS guidelines.”

On page 1-1 of the Forest Plan, it identifies that there are several existing wilderness plans, which were incorporated as management direction. These include wilderness plans for Admiralty National Monument, Tracy Arm/ Fords Terror, and South Baranof Wilderness Areas that are a part of this analysis. With the inclusion of these plans came the adoption of ROS classes that were specifically identified as management direction. These can only be changed through a Forest Plan amendment, which is not being proposed at this time.

The alternatives are consistent with direction in Forest Plan for the ROS classes applied to specific Land Use Designations. With the exception of Enclaves, where the ROS classification may change because of an increased level of use, there are no scheduled land management activities proposed in this analysis that are anticipated to change the current recreation settings.

V. There were comments regarding our analysis of ROS:

Comment 113: The difficulty is that these figures (p. 2-39) are for areas that have the most restrictive ROS class (Primitive) and the most restrictive limit on numbers of group encounters (three). What effect will an increase of these proportions have on the expected number of group encounters in wilderness, beyond whatever those figures are now? This is a critical question, because solitude is a key ingredient in a satisfying Wilderness experience.

RESPONSE: Effects on solitude was discussed in the DEIS in Chapter 3 beginning on page 31. While all alternatives may have effects to solitude, all alternatives meet the objectives for the LUD according to the Forest Plan.

VI. A clarification of terms in reference to ROS was requested:

Comment 113: Terms and expressions that have been used poorly include such fundamental ones as: “the ROS” in many contexts (is ROS referring to Forest Plan guidance or a ROS inventory?); “ROS classification” (classified by management or inventory?); “recreation setting” (not in the glossary, should be explained in terms of ROS indicators); and “existing recreating setting”: (does this indicate the setting intended by present management policy, or the existing on-the-ground conditions?); etc. The glossary needs to be expanded, and in all

Response to Comments—Appendix G

cases terms need to be used with precision, qualifying them with other words or explanations as necessary...

RESPONSE: In the FEIS, wording has been improved and the glossary has been expanded.

VII. A question about the availability of the ROS inventory for public review was raised.

Comment 119: The TLMP ROS classes were never subject to public review and comment until this planning process. There was not map provided in the TLMP process that displayed the inventoried ROS classes.

RESPONSE: ROS classes were identified and discussed in the Forest Plan planning process.

While a map of recreation places was provided in the Forest Plan FEIS map package, there was no ROS map provided in the package. The ROS map used for the Forest Plan process was an inventory tool used for overall forest plan analysis and, was not included as a part of the Forest Plan FEIS map package. The planning process for the Forest Plan is outside the scope of this analysis.

IX. There were questions about the application of ROS standards in specific locations on the Tongass:

Comment 92: Areas outside of designated Wilderness that are designated as Primitive LUDs and Primitive ROS are basically being managed for recreation as if they were designated Wilderness; i.e., they are not available to groups over 12, and in some cases 20, further reducing to a very small area that part of the shoreline zone land which is available for outfitter/guides with groups larger than 12.

RESPONSE: There are no Primitive LUD designations for Forest Plan but there are Primitive ROS classes managed in a variety of Land Use Designations. The Primitive ROS setting does limit the group size to 12 persons whether it is in wilderness or outside of wilderness. The restriction for this commercial group size operating in a Primitive ROS setting is consistent with Forest Plan direction for these LUDs.

X. Some ROS classes in the analysis area were questioned:

Comment 40: Why are ROS classes on Admiralty Island in a Primitive class (especially on the south end), when it appears that there is enough use to justify a semi-primitive ROS class?

RESPONSE: The Forest Plan incorporated existing approved wilderness plans and adopted the ROS Classes from those plans as a part of its direction. (See page 1-1 of 1997 Forest Plan) The ROS class on Admiralty National Monument is consistent with the Forest Plan.

XI. Some asked about being conservative in the ROS designations:

Comment 40a: The ROS classes selected in the carrying capacity use areas picked the more conservative ROS class which effectively “rounded down” the number of groups at one time that could be in an area.

RESPONSE: The concept of carrying capacity assumes that judgment will be made concerning the various factors that are used to derive the capacity. The Forest Service selected the more conservative ROS classes where there were two or more ROS classes in a Use Area. A conservative approach was considered because we

Appendix G—Response to Comments

wanted to ensure a quality recreation experience, the non-commercial component of recreation use is not easy to determine, community concerns, and subsistence uses. This approach should still allow for commercial recreation growth in most Use Areas but enable us to watch the emerging use patterns and determine if additional adjustments need to be made.

XII. There were questions about the application of the ROS guidelines:

Comment 40a: The mandatory ROS User's Guide provides that, "[w]here air and motorized water travel routes provide the only access consider them in a manner similar to roads." The Guide goes on to provide that an area should not be considered primitive unless it is at least three miles from a road. Areas within ½ mile of primitive roads fall in the "Semi-Primitive Motorized classification."

RESPONSE: The ROS User's Guide provides *guidelines* for managing the recreation opportunity spectrum. The intent of the User's Guide is to show that a range of opportunities exists and can be managed. The DEIS follows Forest Plan direction in regard to the application of ROS (Forest Plan page 4-35 for discussion of forest plan direction regarding the Recreation resources).

XIII. There were comments regarding the application of ROS inventory classification in regards to previous discussions regarding potential land use designations:

Comment 119: We are particularly concerned about the semi-primitive Motorized ROS classes' assigned Trap Bay and Kadashan in Tenakee Inlet and Damp Marker, Pinta Cove, Fox Creek and Big Shaw Island. This ROS inventory classification is inconsistent with special management criteria applied in 1990 by Congress to these "roadless [lands] to retain [their] wildland character in perpetuity. In particular, there is nothing within the semi-primitive motorized ROS classification that prohibits authorizing use of ATVs on these Congressionally-protected wildland, with potentially devastating consequences to stream banks, river beds, and wetlands.

RESPONSE: The term all terrain vehicle (ATV) has been replaced with off-highway vehicle (OHV) to be consistent with terms now used by the agency. The DEIS is consistent with applicable laws and forest plan direction as identified in the Forest Plan. The Shoreline EIS will not authorize the use of OHVs or helicopters for commercial recreation use. If a commercial operator requests use of an OHV or helicopter as a part of their operation, these will be considered on a case-by-case basis under a separate environmental analysis by the appropriate authorizing officer (most likely the district ranger). DEIS Chapter 2 page 43 says, "Helicopter and [OHV] use is not proposed in any alternative." DEIS Chapter 2 page 47 specifically addressed the fact that there is currently no historically authorized helicopter and OHV commercial use.

Incremental Implementation

I. Observations about how use and use areas where to allow for increased use were offered:

Comment 5: It would seem prudent for the agency to go slow with this experiment and pick far, far fewer sites initially to be impacted.

Comment 9: I recommend a slow and cautious start by selecting only a few specific sites and studying the effects for a couple years.

Response to Comments—Appendix G

Comment 16: It is very difficult to reduce authorized capacities once commercial interests have developed potential revenue expectations and have made capital investments accordingly. Therefore, the FS needs to be far more conservative in authorizing use levels, especially when there is insufficient demand justification for high numbers of up to 75 people per day and when there is so little research information on impacts on brown bear and other wildlife from such large groups going ashore on a daily basis.

Comment 24: I would like to see the Forest Service offer an alternative that allows for incremental growth, with intensive monitoring to see the effects of this growth on the ecosystem, local economies and local subsistence use.

Comment 108: Starting with lower levels of commercial use allows the possibility of increasing those levels later. It would be much more difficult to install lower levels in a situation where commercial users already operating...One benefit of starting with lower use levels is that if local communities fail to benefit from the commercial operations, some increase can be arranged later that specifically targets operators from local communities and Native groups.

Comment 113: In deciding how much commercial use to promote, it must be considered that whatever the use level adopted, there will be a rush to fill the void of unused commercial capacity. That is a given with a competitive, free enterprise system. Gaining competitive advantage and market share is the name of the game. And as increases in commercial use become apparent, that will only be the tip of the iceberg because business and marketing plans to fill more of the remaining capacity will be secretly in the works for future season. Certainly, it is easy to ratchet up capacity over time, if it is later determined that is the wise course, but ratcheting it down is difficult if capacity was set too high, the public finds the higher use excessive, and business stability (or mindset) has become dependent on growing to fill remaining promised capacity. It is best to set business expectations low, especially at the outset.

Comment 130: ...allow for the gradual, slower-paced planning and developing of tourism and related activities in rural communities by allocating, before carrying capacity is reached, a certain number of group days in community home ranges to businesses owned by local community residents.

RESPONSE: The alternatives for commercial recreation vary in the amount of commercial use to be allowed in this analysis. Monitoring and mitigations for the implementation were described in Appendix C and D respectively to ensure the effects of implementation are within those anticipated and are at levels acceptable to forest plan direction.

Document Inconsistencies

I. Some inconsistencies and corrections to the document were identified or suggested by the reviewers:

Comment 11 – While the Executive Summary on page iii states that the decision will not “regulate or allocate the amount of carrying capacity for non-commercial or unguided use”, it is later stated on page 38-chapter two that “If total recreation use should approach the total carrying capacity of a Use Area in the future, both guided and unguided use would need to be managed.” I would

Appendix G—Response to Comments

suggest that if the Forest Service is allocating “group days” for guided use of areas with a known carrying capacity, they are in effect allocating the remaining” group days” to non guided “groups.”

RESPONSE: The FEIS will correct this language.

II. Regarding existing use levels:

Comment 27: ...there is no way of comparing projected use with actual use levels of 1999 and no way of understanding how these huge increases in human use will impact public resources.

Comment 75: I missed the vital table 3-5 in my initial perusal of the EIS. This table gives historical commercial use by area, a vital piece of information for anyone familiar with current use patterns in an area. For example, the number 254 group days at Point Adolphus doesn't mean much to me until I compare it with the 1999 level of 155. It would be great to put the information on table 3-5 into the use area cards in Appendix A, perhaps in the first table with the carrying capacity.

Comment 113: In truth, 1999 is an arbitrary date for a baseline. Perhaps another date should also be selected, around the beginning of the period of rapid growth commercial wilderness recreation. Both dates should be considered, and changes in the experience evaluated.

RESPONSE: We received several comments regarding the 1999 data. The FEIS now shows an average of use by outfitter/guides for 1999 through 2001 for comparisons of existing use to proposed use by alternative. (See Table 3-5 and Use Area Cards in Appendix A)

III. A clarification of groups per day was requested:

Comment 40a: The Shoreline Recreation Carrying Capacity Analysis establishes carrying capacity figures based upon “groups at one time”, but the DEIS unreasonably and arbitrarily interprets this to mean “groups per day”.

RESPONSE: “Groups per day” is a term used in the Forest Plan for the ROS setting. Groups per day is discussed as a part of the carrying capacity in Appendix F in the DEIS. The document is consistent with Forest Plan in the application of this unit of measure.

IV. A clarification of the document title was requested:

Comment 47: The truncated title of Shoreline Outfitter/Guide leaves one with the question: Shoreline Outfitter or Guide, What? One suspects that the original working title included reference to permits. Perhaps to avoid the thorny issues of limited entry permits, the title was shortened. In essence this permitting process is an allocation of public resources to what will ultimately be a limited number of commercial operators. The strictures on these operators appear to be limited only by shoulds and oughts rather than any enforceable regulation.

RESPONSE: The evolution of the Shoreline Outfitter and Guide document name is explained in the Background section in Chapter 1 on page 2.

V. A clarification of the recreation environment was requested:

Comment 113: One difficulty is that the EIS does not adequately describe the recreational environments (settings) as they exist on-the-ground throughout the

Response to Comments—Appendix G

analysis area. The only such information presented is in two tables (pp.3-12 & 13) which are offered with no supporting documentation. The source of the data is unknown, as is whether the ROS data is managerially (derived from the Forest Plan) or from an inventory of existing conditions. Even if this is inventory data, the data has never been reviewed by the public, the method of derivation is not disclosed in the EIS, and it is not presented in a spatial format (maps) as is essential for good human comprehension of what is reported...

RESPONSE: A paragraph explaining the tables on pp. 3-12 and 13 has been added to the text. The titles at the tops of these tables explain what is being displayed. Table 3-6 is showing the amount of acres for each ROS class by Use Area. The existing ROS class cover for the Forest was used for these numbers. The second table, Table 3-7 is just an account of the linear miles of shoreline is within each ROS class by Use Area.

VI. A request for a clarification of the timeframe for which this document would be in effect was requested:

Comment 113 cont: It should be noted that the adopted plan will have no specific lifespan, since none is mentioned in the EIS...

RESPONSE: The expected timeframe for this document to be used for special use permit management is identified as five years. This is now identified in Chapter 1 under Decision Framework.

VII. A request for clarification of ROS was made:

Comment 113: Area by area, mapped continuously over the analysis area, how do classifications under a ROS inventory lay over the land, and how much will those classifications be changed by the alternatives: These are but a few measures of importance. These are critical comparisons, but note that they are absent from Table 2-13, Comparison of Alternatives, or the discussion.

RESPONSE: The ROS in most of the analysis area is not expected to change, as the use levels identified are consistent with Forest Plan direction. Table 3-16 identifies Acres that could potentially change from semi-primitive to a more developed ROS setting in the Enclave areas. With the exception of Enclaves, the ROS is not expected to change as a part of implementation of a decision as use will be commensurate with current ROS class designations and direction provided by LUD. (DEIS, Chapter 2 page 5)

VIII. A comment about the units of measure in the document was made:

Comment 113: In sections title “Units of Measure “ in Chapter 1 (pp. 1-22 to 25), the EIS lists for each identified Significant Issue how the alternatives will be compared. Two difficulties arise. First, compare these lists with the “Units of Measure” in the Comparison of Alternatives table on page 2-45. They are not the same. Second, most of the supposed units of measure in Chapter 1 are not units of measure at all; they are concerns that should have been identified as significant issues, with various indicators for each to be used in making comparisons of alternatives.

RESPONSE: Units of measure have been revised to be consistent in the document.

IX. An anticipated future recreation inventory map was requested:

Comment 113 cont: For evaluating alternatives, maps of the anticipated future inventory need to be provided...the baseline estimate of currently expected

Appendix G—Response to Comments

numbers of group encounters should be mapped, so should changes to the numbers of encounters for each alternative.

RESPONSE: The alternatives described in the analysis will provide opportunities for growth. Use area cards describe the potential use of an area by alternative, which is the best description of anticipated impacts or projections for growth.

Variables which can affect whether or not these levels of growth are realized may include, but are not limited to, future discretionary incomes by the clients, business decisions for growth, the success of marketing, use of particular attractions based on a client's desire, weather, etc. The total areas of Enclaves was included in the DEIS in Table 2-13 but actual changes will be justified based on the actual use.

X. There was a comment regarding the moratoriums in place according to the document.

Comment 113 cont: On page 1-2 the EIS indicates that concern over increasing commercial recreation was sufficient for the Forest Service to place a moratorium on permitting in “many locations.” This needs either to be listed or mapped.

RESPONSE: Currently there is a moratorium in place for the fall and spring season in GMU 1 and GMU 4 for brown bear hunting. This moratorium represents the entire shoreline within this project area with GMU 1 extending along the mainland down to the southern end of Misty Fjords National Monument. The language in the FEIS will be changed to be more precise in what moratoriums are actually in place.

XI. There was a comment requesting additional information on the Use Area cards:

Comment 113: The unit cards maps are not adequate to understand the recreational environment that is being affected. The maps need to show: Which areas are in the roadless inventory; ROS class boundaries for mapped areas that have multiple ROS classifications. Text on the card should state that classification(s) are from the ROS inventory (as opposed to ROS guidance derived from the Forest Plan); Logging units cut in the past.

RESPONSE: Table 3-3 is sufficient to describe the ROS class by Use Area. As there are no developments proposed by any alternatives and the alternatives are consistent with Forest Plan, no additional evaluation to effects on roadless are being considered in this analysis.

XII. There was a request for a clarification of a term:

Comment 113 cont. p.1-24: “The amount of currently unused commercial recreation carrying capacity.” Commercial recreation carrying capacity is not a defined term.

RESPONSE: Commercial recreation carrying capacity is the total amount of the recreation carrying capacity that may be allocated to a commercial operator such as an outfitter/guide. The Forest Plan says to generally allocate no more than one-half the appropriate capacity of the Land Use Designation to outfitter/guide operations. The alternatives in the DEIS provided a range of appropriate levels of capacity to consider for management.

Response to Comments—Appendix G

XIII. An inconsistency with regard to the fact that there will be some change in ROS was identified:

Comment 113 cont. p. 2-36: “The Use Area allocations were made within the carrying capacities and criteria for each ROS class; therefore, none of the ROS classifications would be changed under the alternatives.”

RESPONSE: Changes to the text have been corrected to reflect the fact that there may be a change to the ROS class in some specific locations, if use of the area occurs as allowed by Forest Plan for some Enclaves.

XIV. A point of the locations of some large group areas was noted:

Comment 113 cont. p. 2- 39: “Large group areas were not located in Use Areas containing communities or in areas receiving heavy local use in any alternative.”

RESPONSE: This statement has been deleted from the document as there are large group areas considered in several alternatives near communities.

XV. A comment about the area used to evaluate the capacity analysis was raised:

Comment 113 - App F-13: “A majority of the coastline is rugged and rocky, so easy access by boat is limited primarily to protect bays and beaches. We assessed where the boats could access the shoreline and where groups could recreate given the local topography within each use area.” Nonetheless, unit cards give gross shoreline miles and acreages, without regard to accessibility, number adequate anchorages, etc.

Comment 119: From the map in the DEIS (p. B-119), it is unclear if the Forest Service intends for there to be three (3) Fifteen Percent areas on the south shore of this bay or the map simply identifies 3 possible anchorages for one Fifteen Percent area.

RESPONSE: Total acres along the shoreline are presented in the Unit Area cards to display the areas considered in the analysis area. While not all lands are accessible, that doesn’t preclude some activity that may occur (hunting in particular) so these areas are considered in the analysis. The discussion of the limitation of access for the carrying capacity was also discussed in Appendix F. Total shoreline miles and acres are just one comparison tool to display effects.

XVI. A comment was made regarding the numbers used in the analysis:

Comment 131: ...Under alternative 3...the number 14,637 seems overly precise, given the speculative nature of assumptions about capacity use. Why not round the numbers off so that they are easier to grasp and compare?

RESPONSE: A computer has generated most of the numbers for this document; particularly where a map was involved. As a result, there is an appearance of being overly precise. Where appropriate, these numbers have been rounded off in the FEIS.

XVII. A comment about consideration of adjacent lands was made:

Comment 143: The DEIS does not make note of the habitat designation on state lands and so raises the question of whether or not the proposed use allocations take this designation into account.

Appendix G—Response to Comments

RESPONSE: During the analysis, the IDT consulted with the State of Alaska Department of Natural Resources on compatible activities and land management direction within the analysis area. Use Area cards now include information showing the land use designations from the State of Alaska Department of Natural Resources planning efforts to emphasize our efforts for consistency.

XVIII. Comments regarding the prohibitions and restrictions for fishing were questioned:

Comment 143 cont: Prohibitions and restrictions on guided sport fishing specifically proposed under alternatives appear arbitrary and are unnecessary for conservation reasons. The analysis explicitly refrained from allocating use between types of commercial activity but then specifically restricted guided sport fishing use in a number of areas as mitigation measures under specific alternatives, i.e. 04-03, alternatives 2, 3, and 5. Although these restrictions are posed specifically for one type of commercial activity (sport fishing) use type, criteria used to decide where and why were not identified or discussed in the analysis...Consequences and the appropriateness of these measures, with respect to guided and non-guided sport fishing and other commercial uses, cannot be assessed without these criteria.

RESPONSE: The prohibitions and restrictions have been re-evaluated and removed from the alternatives.

XIX. A question of where mitigations were displayed was questioned:

Comment 143: Other Tier 1 restrictions on camping near salmon streams, campfires, barbecues, etc, are not mentioned on the use area cards.

RESPONSE: The mitigations for camping were identified in the mitigations on page C-3.

XX. There were corrections to the information in the document presented:

Comment 143: Page 85 reference to Katzeihin River contains productive run of chum salmon. This system also provides important spawning and rearing habitat for coho salmon and Dolly varden.

Comment 143: Page 122 states “No restrictions on the main stems of large glacial streams within the analysis area would be necessary because salmon are unlikely to spawn there.” This assumption is false. Salmon do spawn in the main stems of glacial rivers. For instance, the main stem of the Chilkat River supports a very large spawning population of chum salmon. In addition, large glacial streams often provide valuable rearing habitat for Chinook and coho salmon. Guided activities on large glacial streams need to be monitored to document negative impacts to spawning and rearing habitat.

RESPONSE: The document has been corrected to the facts presented by these letters.

Activity-specific Guide Allocations

I. There were questions about allocations to specific guide groups:

Comment 3: If we were shut out the opportunity would most likely go to another bear hunting guide. If that happened, there would be NO spring

Response to Comments—Appendix G

opportunity in 04-14 for any non-hunting outfitters. The irony is that spring use limits are proposed to preserve opportunities for “solitude.”

Comment 11: At this point a lot of money will be involved, guides will feel “grandfathered” in and will be no turning back as the people who actually live here give way, or chase the shrinking “wild’ into the hills.

Comment 13: In August we were guiding a small group of guests into Clear Creek when a large group of 20+ people off the M/V Liseron landed on top of us and invaded our primitive experience and ruined the remoteness we promote and offer our high paying clients....We are now seeing other tourist vessels such as the Sea Lion, wilderness Adventurer and Safari Quest unload large numbers of kayaks, fishermen and hikers showing little care for both the small guide/outfitter operations as well as unintentional destruction for the fragile estuary and stream ecosystems which lie within the boundaries of Kelp Bay. One of these cruise ships will impact these areas more in one landing than we will in our entire summers of use...I feel we all have the chance through this user allocation process to preserve a unique and precious Bay and river system.

Comment 16: If the Record of Decision (ROD) for this EIS is to meaningfully address use conflicts and not just accommodate 75-person groups, it needs to establish allocations between commercial and non-commercial use, and it needs to provide small business opportunities for residents of local communities within the immediate area...

Comment 22: I still do not have a clear picture as to how the current or future shoreline outfitter/guide industry will be managed because no specific use allocations are made, and no solutions are offered for areas where outfitter/guide conflicts currently occur.

Comment 40a: This plan does not allocate sufficient outfitter/guide capacity in wilderness areas. Within a couple of years, lack of capacity will lead to limited use permitting. Limited use permitting will create a hardship for (us) and numerous other small guided tourism businesses, without any discernable benefit to other users, the environment, or society...Under all alternatives, commercial access to many wilderness areas...will soon be limited, yet there is no discussion in the DEIS on how the Forest Service proposes to design a limited use permitting system.

Comment 49: ...we believe the FEIS needs to contain...a better analysis of use, perhaps dividing usage into guided hunts, guided fishing in streams and guided wildlife/wilderness viewing.

Comment 95: All allocated commercial use must first consider those existing permittees with Priority Use. Expanding on-priority use permits are significantly displacing historical priority use permittees.

Comment 132: All of the document alternatives, as written, will result in displacement of currently permitted “priority use” guiding operations by new, non-priority users...for use to say that hunting guides are overcrowded and that we should not allow additional hunters in the field, and then to turn around and say that there is no room for additional, high impact, sightseers to go afield during the hunting season is ridiculous...Trying to place a commercial user group in every bay during the hunting season will entirely ruin the experience for

Appendix G—Response to Comments

the visiting hunter even though the visiting sightseer may still be catching a glimpse of a young bear once in awhile...There is no room, absolutely no room, for additional spring or fall commercial recreational use in the more highly utilized guide use areas of GMU 4, neither is there a legitimate need to do so.

Comment 138: All commercial uses are not alike and should not be treated as percentages of use.

Comment 143: It would be more appropriate if the DEIS had allocated use to types of guide/outfitter including hunting guides, instead of lumping all commercial use together in one allocation...The DEIS allocates between commercial and non-commercial sectors but stops short of allocating use among the various types of commercial activities. This limitation inhibits an assessment of the effects of individual types of commercial and non-commercial activity (such as sport fishing, bear hunting, etc.) on an area's resources and users....The DEIS gives no guidance to District Rangers or other managers for allocating between types of use when it comes time to issue specific permits.

Comment 44: I do not, however, see anything that will protect the seasons and limited areas where guides can conduct bear hunts.

RESPONSE: There are no specific allocations to outfitters or guides built into the environmental analysis. If needed, a prospectus to allocate the type and location commercial recreation use will consider where appropriate once a Selected Alternative identifies the use level for this use.

II. Some didn't want the Forest Service have a specific user group benefit from an allocation:

Comment 5: We do not believe it is right for the Forest Service to effectively reserve commercial guide use for a specific user group.

RESPONSE: A prospectus for use would consider all proposals regardless of their activity. The alternatives provide a range in considering the commercial recreation use to be accommodated by Use Area. It is possible that a lower level of commercial recreation use in a given area will favor exiting users that have exhibited their ability to provide a service while meeting the terms and conditions for their special use permits. These areas are identified on pages 3-46 and 3-47 in the FEIS.

III. Some commented on the need to keep the public in the allocation equation:

Comment 14: As (the landscape) fills with people, the bear, the deer and the fish are going to disappear and as a result the enjoyment of the bay for local residents is also going to disappear. Should there not be some control over the total number of people using the bay at any one time?

RESPONSE: Non-guided use is an important consideration, which was addressed throughout the Recreation section in Chapter 3 of the FEIS.

IV. Some comments were received regarding the potential loss of outfitting or guiding potential for smaller operators as agencies work with larger operators to accommodate use:

Comment 94: At the same time that the Forest Service is modifying its model for commercial use Glacier Bay National Park is doing the same. Should both of these entities develop rules that make it difficult for small operators to compete with large commercial interests we will stand to lose a substantial portion of our business activity and our market.

Response to Comments—Appendix G

RESPONSE: The FEIS does not identify a minimum or maximum party size to be accommodated on National Forest System lands by outfitter/guides. A range of opportunity is generally considered in the allocation of recreation commercial use days. As a breath of experience in generally considered when identifying outfitter/guides, it's unlikely that new larger commercial operators will displace smaller operators who have demonstrated their ability to successfully accommodate users to the National Forest while meeting the conditions of their special use permit.

V. Some comments requested an expansion of the total days available for commercial recreation use:

Comment 41: The DEIS proposes to allocate commercial operators less than 50% of the total recreation carrying capacity in all alternatives (an average of 23% in the preferred alternative.) And in contrast to the offer extended to non-commercial recreationists, the DEIS denies commercial operators any allocation of underutilized total capacity. This is clearly contrary to the Forest Plan Recreation and Tourism Standards and Guidelines, which state the outfitter/guides may be issued Temporary Use authorization where this is surplus capacity not being used by the general public.

RESPONSE: In Forest Plan, under the Standards and Guidelines for Recreation and Tourism on page 4-41, it first notes to generally allocate no more than one-half of the *appropriate* capacity of the Land Use Designation to outfitter/guide operations [emphasis added]. The allocation of any surplus capacity as noted in Forest Plan on page 4-42 can only be considered after the appropriate capacity is decided.

The issuance of a surplus capacity to commercial recreation users is a discretionary authority provided by the Forest Plan, which may be considered on a case-by-case basis.

VI. One comment questioned the incentive we provide in setting limits to having companies filling these:

Comment 132: When an agency does a carrying capacity analysis to establish limitations on future commercial allocations, it inevitably creates a “gold rush” among commercial users as they see the door beginning to close. This “carrot-on-a-stick” scenario motivates commercial operators to offer cut-rate incentives, even free trips, to clients just to establish use and to increase their piece of the pie. This creates an artificial demand that can be very sudden and very significant.

RESPONSE: The DEIS provided a range of alternatives in considering what level to manage commercial recreation operators. This range, along with the identified mitigation and monitoring requirements, allow the Forest Service tools to examine implementation.

Annual Operating Plans are reviewed and approved by the authorizing officer. The actual use must be reported annually and non-use is considered each year when an operator asks for use of National Forest System lands in a new or renewed permit.

Appendix G—Response to Comments

Coordination with Other Agencies

I. Some mentioned that both State and Federal agencies seemed to be moving more in the direction of commercialization of resources.

Comment 17: ...between this plan and the State of Alaska DNR Mariculture sites just about all protected areas have now been dedicated for commercial use of some sort.

RESPONSE: Commercial recreation use of National Forest System lands does not dedicate these lands for such use but does provide opportunities for access or exploration. There are still places on the Tongass where use by outfitter/guides is infrequent or negligible.

II. Others wanted to see a better connection between the State and Federal planning efforts:

Comment 16: The EIS needs to display what resource allocation decisions the state has made in waters adjacent to each upland area that the FS has addressed in the EIS.

RESPONSE: References to the planning efforts by the State of Alaska, Department of Natural Resources have been better referenced within each Use Area description.

III. Others ask for use to explain inconsistencies between State and Federal Plans.

Comment 26: During negotiations with the State of Alaska in developing the Northern Southeast Area Plan for State owned lands in Southeast Alaska, the ADF&G was adamant that there should be no development in the (Goose Flats) area and the State has subsequently indicated that it would drop its selection of a parcel of land in the Goose Flat Area in deference to the wishes of the ADFG and local residence.

RESPONSE: References to the planning efforts by the State of Alaska, Department of Natural Resources have been better referenced within each Use Area description. Other considerations through comments have come to our attention specifically regarding Goose Flats which is may be reconsidered for a large group designation. Specifically, the US Fish and Wildlife Service has requested the Forest Service not designate a large group area at Goose Flats because of molting waterfowl.

IV. Some asked about the coordination between all agencies that have some role in managing the shoreline areas.

Comment 33: It was also clear that a great deal more coordination between agencies needs to be done before any of the Forest Service proposals could be usefully put before the public. The proposals ...were riddled with unintended consequences. Medical emergencies will increase proportionate with numbers and increased demand for Coast Guard resources is inevitable.

Comment 52: Assuming that the State of Alaska controls the intertidal zone; will a separate permitting system be needed for commercial groups to cross these lands to access Forest Service lands?

Comment 95: State tidelands should be managed in concert with U.S. Forest Service uplands. Lack of State regulations and permitting currently create significant management problems. A significant amount of “illegal” unregulated

Response to Comments—Appendix G

guided hunting occurs on State lands “below” high tide, particularly on South Admiralty Use Are 04-06 A.

Comment 108: ...we have seen little to no enforcement of the National Marine Fisheries Service (NMFS) standards, even in cases of well-documented breaching of them by whale watching vessels.

Comment 130: The Forest Service needs to develop its shoreline carrying capacities in cooperation with the State of Alaska to ensure that they are meaningful. To effectively manage human shoreline use, it is essential to cooperatively address both state intertidal land below mean high tide and federal intertidal land and upland above mean high tide.

Comment 137: ...these commercial uses will be superimposed on already heavy public use of many of these areas, especially those areas within the Sitka Coastal District which receive the greatest or most outstanding, site-specific recreation and /or subsistence uses or which have very high-value resource values....It is likely that permitting commercial uses in at least some of the Sitka Coastal Program Special Management Areas would be inconsistent with the referenced Enforceable Policies.

RESPONSE: Permit holders are required to obtain all valid authorizations required to operate legally. These include any license or permit required from the State or local governments. Permits issued by the Forest Service are only for the authorization of use on National Forest System lands. Forest Service permits are issued when they are consistent with management direction. As noted, the State of Alaska Department of Natural Resources management plans for the shoreline areas within this project have been considered for consistency in this document. (See Use Cards in Appendix A) The Forest Service participated in the meetings regarding the management of State lands.

As mentioned in the responses to monitoring, the National Marine Fisheries Service and Coast Guard have the responsibility to monitor the marine waters. The Coast Guard also has additional responsibilities on navigable waters.

Operating plans are provided by permit holders, which describe how they will conduct their operations safely and how they would react to emergencies.

The Forest Service has successfully prosecuted several illegal outfitters or guides over the past several years and continues to pursue other cases.

V. Some advocate for some form of stakeholders task group.

Comment 46: ...what I am suggesting is that the Forest Service delay issuing the FEIS and create a stakeholders task force to review and modify this proposed Outfitter/Guide management plan so that in the end you will have a plan that actually reflects the needs of the region. Participants in this task force should include representatives from all sectors of Southeast Alaska including: the local communities, fish & game advisory committees, Native Alaskan organizations, cruise ship companies, Outfitters & Guides, ADF&G, the US Fish and Wildlife Service, environmental organizations, the Forest Service and perhaps others...

Comment 92: A strategy that has been successful elsewhere in reducing conflicts among operators in popular ship-based destinations has been the establishment of an industry/agency association with convenes periodically to openly discuss issues, concerns, and offer solutions relating to operating in the particular geography.

Appendix G—Response to Comments

Comment 105: The (Angoon) Tribe should have say over who is given a permit. Guides should be required to adhere to traditional protocols and permissions needed from the community.

RESPONSE: The Forest Service currently participates as a part of several groups working on behalf of the recreation and tourism industry. The Forest Service had representation on the Brown Bear Management Team, which provided recommendations to the Forest Service, State Agencies, and others involved with the management of brown bear in southeast Alaska. The Forest Service has also co-sponsored forums with other State and Federal agencies regarding recreation and tourism over the past several years which has also included participation with local entities. The public also has opportunities to participate in the planning of projects on National Forest System lands through the quarterly schedule for environmental documents.

The consultation with Federally Recognized Tribal governments and other government agencies was described in the DEIS in Chapter 1 on page 17.

The suggestion for further coordination and cooperation is noted. However, the establishment of a formal stakeholder group could only occur if designated by the Secretary of Agriculture as consistent with the Federal Advisory Committee Act.

VI. Some advocate for more direct participation between agencies in managing resources.

Comment 54: ...a monitoring program needs to be clearly laid out with mandated peer review from in-house and Alaska Department of Fish and Game biologists at a minimum.

Comment 130: ...the Forest Service must demonstrate its commitment to bear protection by working collaboratively with the Alaska Department of Fish and Game and by providing funding and other assistance to the Alaska Department of Fish and Game for its studies of brown bear populations, density, and behavior.

RESPONSE: Impacts anticipated by recreation use were evaluated in the Forest Plan. The potential impacts led to Forest-wide monitoring protocols that were negotiated between State and Federal agencies during the forest planning process. The FEIS has incorporated suggestions by other agencies and the Forest Service will continue to share monitoring information to assist agency goals and objectives. Funding for Forest Service monitoring projects is reviewed annually for priorities. Inventory needs for the Tongass are listed in Appendix B of the Forest Plan.

Special Use Permit Administration Issues

I. There were questions pertaining to the Forest Service's ability to monitor special use authorizations.

Comment 26: The FS indicates that it intends to rely largely on permitted operators and ordinary citizens to monitor compliance with the new regulations. This kind of approach for a regulatory agency is both ludicrous and unworkable. If the FS is unable to enforce and monitor its current regulations then perhaps instead of permitting vast amounts of additional use it would make more sense to keep a moratorium on new permits in place until such time as the FS can adequately address its responsibilities in administering such a permit system.

Response to Comments—Appendix G

Comment 41: Since the Forest Service is unable to monitor current levels of use on the forest and enforce its current regulations it is illogical to propose a process that will result in permits for a vast amount of additional use. Instead it makes more sense to continue a responsibility to administer such an expanded permit system.

Comment 119: How often are outfitter/guides required to submit actual use reports? Are these use reports sufficiently formalized to provide the Forest Service with scientifically verifiable data regarding the effects of the permitted activities on forest resources, and the effectiveness of best management practices at mitigating effects?

Comment 128: A self-monitoring system set up for all guides to watch each other is a good idea and can be effective, but this should be encouraged through the permitting process.

Comment 138: If permitted activities in a site cause serious problems for other users or for the resource of the area, there should be a formal way that the public can intervene to correct the problem.

RESPONSE: Permit holders are required to submit an operating plan at the beginning of each season for approval prior to the issuance of their special use authorization. Following the end of the season, permit holders provide annual use reports that specify what they had accomplished for actual use for that season.

Actual use reports are used by permit administrators to assist in their identification of key areas for monitoring. Information provided by other staff or from the public also helps target specific areas on the forest for field investigations.

Only actual use of the service days requested by the permit holder will be considered in a request for priority use. (A service day defined by the Forest Service manual is the use of National Forest System lands for any part of a day by a customer of an outfitter/guide.)

II. There were questions about how the allocation process is affected by existing permit holders:

Comment 23: It would appear that those individuals with prior use (or priority use) are able to exert enough influence on the USFS to exclude the more recent individuals requesting entry permits to the federal forests.

Comment 147: ...the council for the city of Port Alexander has a long history of opposition to extensive especially external tourism documented through resolutions, ordinances and our comprehensive plan; that the local commercial tourist industry fully utilizes the commercial allocation under any of the proposed alternatives; and that there is a strong interest in not allowing the displacement of the private noncommercial user groups from their habitat and usual subsistence areas and purposes.

Comment 92: ...we feel it would be unfair for the Forest Service to place any undue emphasis on an operator's recent historical use of Fords Terror as an eligibility criteria for the allocation of permits.

Comment 132: None of the alternatives in the draft EIS adequately protect permitted historical use of priority users against displacement by non-priority permits.

Appendix G—Response to Comments

Comment 22: ...With what the USFS has done, has failed to do, and proposes to do, I do not see how anyone new can enter (outfitting or guiding for brown bear hunting) now or in the future. You have effectively made a very few permittees, very wealthy.

RESPONSE: In most locations on the forest, the use appears to be well below the capacity to accommodate commercial recreation outfitters or guides. If there is a determination that there is a competitive interest in a location where use has reached managements decision for a capacity, a prospectus will be issued to assist in the allocation of a limited capacity.

If a prospectus were needed, it would take into consideration priority use as a part of the criteria. Priority use is earned by having operated for at least two successful seasons with a special use permit. The amount of priority use an operator may have is an average of the service days for those years they have successfully met the conditions of their permit. Permits are not transferable but depending on the use type or experience of a purchaser of an outfitting or guiding business, there are provisions in the permit where a new owner of a business could assume control of the established operations. Issuing a permit to a new business owner is at the discretion of the authorizing officer. The authorizing officer is normally the district ranger who has issued the special use permit. Priority use days are not transferable and a new business owner would still be subjected to having to demonstrate their ability to perform over several years to reestablish priority use days.

If an operator discontinues their business, their service days may be reallocated or put up through another prospectus as needed. As there appears to be some limits for some activities on the national forest, such as brown bear hunting, the competition for available use will likely go to more qualified operators rather than to new businesses primarily because of the experience required.

Since the DEIS was provided for review, the Forest Service has issued regulations that provide for a priority for local residents and Native Corporations for visitor services in areas identified as conservation system units (CSU's). CSU's on the Tongass National Forest include all wilderness areas and National Trails. Visitor services do not include outfitting and guiding services for fishing or hunting but may include such uses as wildlife viewing, sightseeing, hiking, or other non-consumptive uses.

III. Questions about permit administration were presented:

Comment 8: How does the EIS propose to keep these (large) groups confined to the area drawn on the maps?...Even defining the perimeter of these areas would be meaningless since once a large group is broken down into subgroups of 12 or less no restrictions apply.

Comment 40: The disconnect between the current system of use based on service days and the regulatory goal of limiting group encounters requires a full explanation of the interrelationship and effect of the proposal on the permitting process in the DEIS before commercial operators can begin to access the potential impact of the proposal on their businesses and formulate meaningful comments.

Comment 32: I have witnessed harassment of other visitor industry users by a specific kayak guide company...This company has clients on the beach...and calls transition and touring boaters up on the VHF radio and alleges prohibited practices concerning whale watching. This company is creating a hostile

Response to Comments—Appendix G

situation and does not create an unfriendly atmosphere for other users of the area.

RESPONSE: Permit administration is one key for the implementation of the decision for this document. How some operations will bring their clients onto National Forest System lands is identified in the operating plans and agreed to with the authorizing officer prior to the use beginning that year. A large group may congregate at the large group areas as approved or disperse into several smaller groups (see clarification of how large groups will be counted on the landscape on page 3 of Chapter 2). All use must be reported accurately in their year-end actual use report. An actual use report filed with false information would be a violation of the terms and conditions of the permit and could result in suspension, revocation, or termination of the permit.

Actual use reports are compared to field observations or comments provided by the public, and whenever possible, to ensure the operators are following their operating plan. As the special use permit does NOT provide for exclusive use of National Forest System lands, feedback on how permit holders operate from any source provides the permit administrator information to validate or to follow up on.

IV. There was a question about actual use reports and their scientific validity:

Comment 119: SCACC Page 12 – Are the actual use reports submitted by outfitters and guides sufficiently formalized to provide the Forest Service with scientifically verifiable data regarding the effects of the permitted activities on forest resources and the effectiveness of best management practices at mitigating effects?

RESPONSE: Information from actual use reports is used in part to assist in the monitoring of National Forest System land. Information provided of locations from guided use and the amount of use an area received is provided to other resource specialists to target or flag areas where field investigations should be a priority. There are many variables to consider for potential as noted throughout Chapter 3. Where the commercial recreation operators go, the type of use, and the number of clients, are all important to monitor and cannot be precisely predicted each year as many outfitter/guides accommodate the specific needs of their clients. As there are so many variables, no scientific method can reasonable be applied. More information on the monitoring and mitigations is noted in appendix C and D.

V. One letter requested additional information is provided to the guides to ensure their operations are consistent with the decisions in this document:

Comment 40a: Unless the Forest Service provides the public with maps identifying ROS class locations outside wilderness areas, outfitters and guides will know the location of Enclaves and Fifteen-Percent areas, but they will not know where they must limit their party sizes to 12 people and where they may take party sizes of up to 20 people.

RESPONSE: The Record of Decision and FEIS will include the necessary information to implement the decision. Permit holders are authorized to use National Forest System only as authorized by their permit after operating plans are approved. Permit administrators work with the permit holders to ensure their operations meet Forest Plan direction.

Appendix G—Response to Comments

VI. One letter asked for more say by local communities in the authorization of special use permits:

Comment 48: Communities and people living in the areas affected must have the means to exert control over permit granting. Allocation decision must be based on information that can, at this point, only be provided by the individuals living there.

RESPONSE: Comments to this DEIS are considered in the final decision for this analysis. Requests to conduct activities beyond the scope of this document will require additional analysis and will require additional public notification. As the decision for this analysis is expected to be in place for a five year period, the update to this decision will allow for the public to comment regarding the relative success of the implementation of this decision.

VII. The impact from illegal outfitting/guiding was presented for our consideration:

Comment 19: The Forest Service did not take into account when putting together the current document the amount of guided use that is going on without the proper permits.

RESPONSE: The analysis can only consider known information. Forest Service law enforcement officers and State Troopers have been successful at prosecuting several illegal operators over the last couple of years and will continue to pursue new cases as needed.

VIII. Impacts from illegal or inappropriate activities:

Comment 26: While guiding on National Forest land, I personally witnessed many adverse effects. I saw guides shooting at bears and eagles and I saw evidence of stream bank damage, unsafe campfire practices and littering. I have seen clients harassing spawning salmon. I watched in disgust as guided clients mishandled and needlessly killed numerous trout, dolly Varden and salmon while their guides looked on or even took pictures and made no attempt to educate them about proper fish handling. I have seen (and heard other accounts of) guides being confrontational or even belligerent with unguided fishers and sightseers and even with other guests.

Comment 48: The ROS for Crab Bay enclave allows ATV and high clearance truck use, which is entirely wrong for the unroaded head of the bay. The permit officer during the (our) teleconference...said (we) “wouldn’t permit that.” How could a permitting officer refuse to permit an allowed activity?

Comment 110: ...concern about cruise ships of 200 bringing people on shore illegally without permits.

RESPONSE: As mentioned in several places, inappropriate or illegal behavior can result in the suspension, revocation or termination of a special use permit. Reports of inappropriate activities are taken seriously and can be investigated by either the permit administrator or law enforcement depending on the severity of the infraction and the availability of personnel. However, in receiving reports of inappropriate or illegal activities, what is normally lacking is adequate documentation to substantiate the claims. Pictures, videotape, dates, times, boat numbers, the name of the operator, the names of other observers or other information of this kind all help in any investigation.

Response to Comments—Appendix G

Special use authorizations specifically note that use of National Forest System lands is not exclusive. Reports of inappropriate behavior can lead to a suspension, revocation or termination of a permit.

IX. There were specific questions related to special use permit administration:

Comment: What are the fees to be paid by the commercial users and will these fees be enough to cover the management costs, or will the general public once again have to pay the bill for the agency to manage the commercial users?

RESPONSE: The Alaska Region charges outfitter/guides a fee for their commercial use of National Forest System lands based on an approved payment. The fee charged varies depending on the activity. Funds collected are distributed several ways. First, under the provisions of the Land and Water Conservation Act, up to 15% of the fees can be retained by the local office for use in billing or accommodating other aspects of the management of the financial end of permit administration. The remaining 85% is deposited into the US Treasury where 25% of these funds may be returned to the State to compensated for activities on National Forest System lands that are not subject to State or local taxation.

Funding for the Forest Service for most work associated with special use permit issuance and administration come from Congress through their annual budget appropriations process.

X. There were some notes about the current management situation and the Forest Service's inability to regulate operators not under permit with the Forest Service:

Comment 40a: Charter boats and small cruise vessels sometimes discharge flotillas of “unguided” kayaks into bays and allow (or even encourage) clients to go ashore. Some charter boats will dispatch skiffs to deliver “unguided” groups of clients to shore, and then skiff crews will hang-out by their skiffs, or return to the mother ship, or even join their clients on shore for fishing or hiking activities....The Forest Service's failure to address these problems in the DEIS is discriminatory against all the permitted guides who are conscientiously operating within the system, and it violates Forest Plan direction which states that the Forest Service shall, “Cooperate with state and local authorities and user organizations to resolve situations where illegal outfitters are known to be operating.”

RESPONSE: Measures to reduce industry conflict were addressed in the DEIS in Chapter 3 beginning on page 55. The State of Alaska issues outfitter/guide permits for lands and waters managed by the State of Alaska. Differences in permit requirements and interpretations of allowed uses will likely continue between the two agencies.

Appendix G—Response to Comments



**Official Comments on the
Shoreline Outfitter/Guide Draft EIS**

Appendix G—Response to Comments

Shoreline Outfitter/Guide Draft Environmental Impact Statement

Public Comment
From
Sheldon Jackson College, Sitka
October 2002

"Outfitter/guide actions shall contribute to the partnership with the Forest Service in nurturing and encouraging assistance and support for attaining the objectives of the land use designation, and to assist in increased public understanding and appreciation of the Forest Service's mission and goals." Mitigation Measures Appendix C: 3

"The Forest Service recognizes the importance of community connections and relationships. Strengthening community connections is vital to provide relevant services and plan for economic development. The Forest Service supports community objectives for building recreational programs, facilities, and services that contribute to local and regional economies and quality of life. The economic health of local communities relies increasingly on the tourism industry. *The Forest Service will join with commercial business, non-governmental organizations, trade associations, other government agencies, and educational institutions in forming viable and sustainable nature-based tourism industries.*" Management Direction, Appendix E

Sheldon Jackson College is very interested in joining with the Forest Service in developing effective means for increasing "public understanding and appreciation of the Forest Services mission and goals." We welcome and embrace the opportunity to partner with the Forest Service "in forming viable and sustainable nature-based tourism industries."

As a private institution with over 120 years in the region, SJC has witnessed the full history of US Tongass Forest. From pre-Forest Service days to the Tlingit-Haida Decision of 1939 to ANSCA to ANILCA to the current move towards increased tourism, SJC continues to be a community stakeholder. In this long history, we are unaware of any partnerships between SJC and the Forest Service. Now, with your new management direction, we would like to add a chapter to our respective histories. We want to be an effective and healthy community partner of the Forest Service. And, we have a few suggestions that could become the basis of formal agreement.

Shoreline OIG EIS
2/9/2010
10/2002

1 / 5

Two years ago, while experiencing the change in the local economy, SJC created a new undergraduate major, Outdoor Leadership. Our new, developing program shares several goals and objectives with your Management Direction and Mitigation Measures under review. We too seek to increase understanding and appreciation of the Forest while providing our students with the knowledge and skill to sustain a viable career in nature based tourism and education. Our Outdoor Leadership major includes courses in environmental interpretation, wilderness expeditions, organization and management of adventure programs, coastal kayaking safety and navigation. All of our field courses, mostly conducted in the Tongass, involve Leave No Trace techniques, leadership judgment, and other wilderness use issues. We also require that each student majoring in Outdoor Leadership complete an internship, a broad based experience with an approved agency in the field of outdoor education.

We suggest that we join together, the Forest Service and Sheldon Jackson College, to pursue some specific activities or programs in partnership that directly relate to this document under review and our new Outdoor Leadership major. We share too much to ignore a potential working arrangement. Our partnership could be a wonderful opportunity for the Forest Service to practice its commitment to increasing public understanding of forest use issues, a wonderful learning experience for our students, and a wonderful opportunity for our small historic college to become more involved and committed to the local community.

Initially we suggest five possibilities. We have many more ideas and dreams, these five are just a start.

1) Annual Conference:

Develop and co-sponsor an annual conference for shoreline outfitters and guides. This conference could provide a consistent, regular forum for the Forest Service to share the latest information (or curriculum) about new management directions and provide an arena for outfitters and guides to share ideas and knowledge relevant to developing sustainable industry. SJC would be happy to host this conference as it would help us increase the sustainability and quality of our new program in Outdoor Leadership. We can offer our hospitality and campus.

2 / 5

Response to Comments—Appendix G

2) Curriculum Development:

Have your permit administration department brainstorm with your interpretation department to develop specific curriculum goals aimed at educating guides and shoreline outfitters about new management directions. Our faculty and some advanced students would be willing to join in this venture, helping to design and deliver new curriculum aimed at Forest users. This curriculum development could have multiple goals including:

- (a) increasing the public understanding and appreciation of the Forest; (b) helping to forge healthy partnerships between the Forest Service and various local guides; (c) providing clear, concise, and effective education for the guides and outfitters permitted to operate in the Forest regarding important issues.

3) Course Offerings:

SJC could design and deliver courses and workshops that directly address Forest Service mitigation measures, management directions, or other concerns. In partnership, we could provide academic and pedagogic support, serving your staff and our students. For example, we could design and deliver leadership training for your staff.

4) Internship:

We could develop a specific internship at the Sitka office of the Forest Service for Sheldon Jackson students. This internship would help the Forest Service meet its stated goals of partnering with the community and provide a wonderful learning opportunity for our students.

5) Guide/Outfitter Definition:

We can help clarify the definition and responsibilities of a shoreline outfitter/guide. Your document makes few distinctions within this broad category of forest users. We anticipate that as use increases these various types of guides and outfitters will begin to in-fight, as they do in other more heavily used public lands. The proposed annual conference and other mitigation efforts that further define the varied work of outfitters/guides may help prevent divisiveness.

3 / 5

We thank you for this opportunity for public comment and hope you will seriously consider joining with us in a formal partnership. We share, with you, a commitment to raising awareness of the Tongass Forest and a desire to develop a viable sustainable nature-based industry. Our common commitments, parallel histories, and complementary institutional agenda could be combined to produce a very exciting and fruitful partnership, beneficial to all.

Sincerely,

Michael Kaplan

Assistant Professor of Outdoor Leadership
Sheldon Jackson College
Sitka

4 / 5

Appendix G—Response to Comments

146



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1689 C. Street, Room 119
Anchorage, Alaska 99501-5126

November 6, 2002

ER 02/0695

Shoreline Outfitter/Guide Project
USDA, Forest Service
Tongass National Forest
Attention: Ms. Mary Beth Nelson
204 Signaka Way
Sitka, Alaska 99835-7316

Dear Ms. Nelson:

The Department of the Interior has reviewed the U.S. Forest Service's (USFS) July 2002 Shoreline Outfitter/Guide Draft Environmental Impact Statement (Draft EIS), which proposes to allocate commercial recreation carrying capacity for portions of Admiralty Island National Monument, and Juneau, Hoonah, and Sitka Ranger Districts of the Tongass National Forest (Tongass). We believe that the following comments need to be addressed in the Final EIS.

USFS has analyzed five alternatives. Alternative 1 is the No Action alternative, which continues to manage special uses on the Tongass by individual permit. Alternative 2 emphasizes limited commercial use of the Tongass in the spring and fall, proposes no large group areas, and no wheeled plane access. Alternative 3 places more emphasis on increasing visitor access. Alternative 4 places emphasis on providing more opportunities for solitude. Alternative 5 (preferred alternative) emphasizes limited commercial use of the Tongass in the spring, some large group areas, and limited wheeled airplane landings in some places.

Specific Comments

Chapter 3-127 and 3-130, Kittlitz's murrelet. The Draft EIS states that "The DOI declined to list the Kittlitz's murrelet at this time." This sentence is inaccurate and needs to be revised in the Final EIS. The Fish and Wildlife Service (FWS) has not made a final determination on the petition to list the Kittlitz's murrelet. FWS is in the process of evaluating the available scientific information on the biology of Kittlitz's murrelet, its status, and potential threats to the species, for possible designation as a candidate species. FWS will keep USFS apprised of any agency action taken for this species, and will cooperate with USFS in formulating any necessary conservation efforts to protect the Kittlitz's murrelet.

Appendix B, Large Group Areas. FWS recently completed a summer and winter aerial waterbird and marine mammal survey for all the shoreline area of southeast Alaska. Waterfowl are found

Shoreline OIG EIS
2.9-0021
11/06/02

1/3

10/11/02

calling- Dennis Liston - Mayor of Craig Alaska
called - Beth Fremblay

Dennis called to ask questions about the Shoreline
DEIS and to provide some comments.

We feel that the group areas proposed would cause
conflicts between commercial and local users.

The State's land-use planning has not satisfied some
local concerns for conflicts as there have been allowed
to occur that have conflicted with traditional commercial
areas. Specifically, lodges are placed where the fishing
fleet has had traditional anchorages.

These really are not remote locations anymore. People
who live in Alaska know how to get around.

We need the boats to make more use of communities
where they would spend money.

Beth Fremblay
10/11/02

Shoreline OIG EIS
2.9-0013
10/11/02

1/1

Response to Comments—Appendix G



126

November 7, 2002

Shoreline Outfitter/Guide Draft EIS Comments
Attn: Bill Tremblay
USDA Forest Service
Tongass National Forest, Sitka Supervisors Office
204 Signaka Way
Sitka, AK 99835

Sealaska Corporation appreciates receiving the draft EIS and having the opportunity to comment. As the Native regional Corporation for Southeast Alaska, Sealaska takes very seriously how the Forest Service manages all of the natural resources on the Tongass National Forest so as to best benefit all citizens, especially those who reside in the rural communities. Therefore, how the management of outfitter/guide access to national forest lands is implemented is of great concern. The management of this activity must not diminish other obligations that the Forest Service is mandated to meet.

Sealaska supports Recommended Alternative 5 for incorporation into the management of the Tongass NF as long as the Forest Service is careful to assure that the management elements delineated below are not modified in any way that would adversely affect the social and economic needs of those who live in our region.

- Subsistence activities are very important to the economic and social fabric of all of the residents of the smaller communities, and to a lesser degree, residents in Juneau whose family ties are to traditional uses. The impact of outfitter/guide activities must not adversely affect the efforts of these participants to continue to be successful in their efforts to subsist. This program should provide a substantial cushion regarding outfitter/guide visits to make sure subsistence values are protected. It is essential that the Forest Service monitor the impacts of the outfitter guide management program so as to be ready to modify its implementation if there are indications of any negative impacts on subsistence.
- The Forest Service must monitor big game movements to the point that should there be any modification of big game habitat usage for which outfitter/guide activity may have been a contributor, the management of the outfitter/guide activities can be modified.
- TLMP provides for significant opportunities to manage national forest amenities for the benefit of citizens and visitors to Southeast Alaska. TTRA requires meeting the demands of the forest products industry as it endeavors to rebuild itself. Forest management, including timber harvest, is very important to

Shoreline OUG EIS
2-9-2004
11/07/02

1/3

One Sealaska Plaza, Suite 400 • Juneau, AK 99801 • 1276 • Phone (907) 586-1512 • Fax (907) 586-1826

along most shoreline areas of southeast Alaska; however, some distinct areas are more important than surrounding habitats because they provide food or protection from disturbance, weather, or predators. We have compared the results of the summer survey (in press) with the Large Group Areas being proposed in the Draft EIS.

As a result, we recommend that the following Use Areas identified in the Draft EIS undergo further evaluation as Large Group Areas because of their high fish and wildlife values, specifically their documented importance as summer waterfowl feeding, nesting, resting, and/or molting habitat: 01-05C (Sand Bay), 04-08 (Fowler Creek), 04-12 (Crab Bay), 04-12 (West Tenakee (Goose Flats)), 04-13 (Ushk Bay), 04-04B (Cosmos Cove), 04-11 (Neka Bay North Bight), and 04-12 (Seal Bay). FWS is willing to work with USFS to help minimize potential impacts to these waterbird concentration areas as more specific proposals are developed.

We appreciate the opportunity to comment on this document. If you have any questions concerning the above comments, please call Bruce Halstead, Juneau Fish and Wildlife Service Field Office, at 907-586-7069.

Sincerely,

Pamela Bergmann
Regional Environmental Officer - Alaska

Page 2 of 2

2/3

Appendix G—Response to Comments

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836-8068 907/568-2211 Fax 907/568-2207

141

supplementing the village and Southeast Alaska economy. Currently, village unemployment is very high largely due to the Forest Service's inability to offer economically viable sales. It is absolutely essential that the addition of an outfitter/guide program in no way hinder this requirement of TTRA.

- In recent years, village unemployment has been high due to the substantial reduction in timber harvest and modifications in the fishing industry. Villages have suffered because the quality of wages derived from timber harvest is substantially greater than from other industrial and service wages. The outfitter/guide program will have practically no beneficial effect on rural wage quality. Therefore, implementation of the program must be conducted in a manner that will allow other, more important employment segments to get back on their feet as that becomes possible.

Thank you for allowing Sealaska to respond.

Sincerely,

SEALASKA CORPORATION



Russell A. Dick
Natural Resources manager

Bill Tremblay
P.O. Box 309
Petersburg, AK 99833

Re: USDA Shore line Outfitter/Guide-Draft environmental impact statement

I am enclosing a copy of two ordinances that reflect the wishes of the community, pertaining to tourism in the immediate area. As you can see in ordinance 98-10 (land use code) any commercial tour boats coming into Port Alexander jurisdiction to do business would need a conditional use permit from the city before doing so, if it was allowed.

Our comprehensive plan gives a broader over view for the uses immediately surrounding Port Alexander to support our chosen life style, and to maintain the desired atmosphere we wish to live in. Any more influx of people into the small area we have to work with will be detrimental to our community.

Respectfully
John W. Lawson



John W. Lawson 11-30-02
Planning Commission Chair Person

Shoreline O/G EIS
2.g-0040
11/30/02

2/3

1/19

PORT ALEXANDER COMPREHENSIVE PLAN

INTRODUCTION

PURPOSE

A comprehensive plan is a guide for making decisions that affect the future development of a community. The plan identifies community goals and sets policies and development standards to achieve the goals. Thus, when issues arise about development or capital expenditures, they can be evaluated on a basis of established policy. This helps assure that development and expenditures will be consistent with community goals.

The original Port Alexander Comprehensive Plan is the result of a four-year effort by members of the Planning Commission, City Council and interested residents. The Plan was formalized after several citywide meetings and countless work sessions and adopted in 1984. Revision process was begun in 1995 and adopted in 1996. As adopted by the city, this plan becomes the official framework for future development.

Three key terms are used throughout this document:

Plan Element: A major category or subject area, such as land and water use, circulation/transportation, or community facilities.

Goal: A desired condition or situation to be achieved.

Objective: A course of action selected to reach a goal.

UPDATING THE PLAN

The Planning Commission will meet annually during the month of January. The Commission will write a brief addendum to the plan. It should include a description of events during this time that have affected the plan, how the plan was affected, and, if appropriate, recommendations for changes in the plan. If changes in the plan are recommended, hearings will be held to ensure that the goals and objectives of the plan accurately reflect the long-term quality of life and the desires of the community.

Draft Copy 1-25-02

2/19

PORT ALEXANDER COMPREHENSIVE PLAN

BACKGROUND

I. REGIONAL AND LOCAL SETTING

Port Alexander lies on the East Side of Baranof Island, six miles north of Cape Ommaney, the island's southernmost point, and approximately 60 miles southeast of Sitka. The topography of Baranof Island's southern end is steeply mountainous with the high ridgelines descending into arms of the sea. The community is located on one of the smallest of the arms, which is a narrow and shallow, but excellent boat harbor. The harbor is about one mile in length and opens into a broad circular lagoon at its north end. The lagoon is ¼ mile wide at its widest point.

The city has an official year round population of 81. In the summer the population swells by a quarter with itinerant fishermen who make the community and its harbor their base for the fishing season.

The effect of the town is both tranquil and refreshing. There are no cars, and while some people own ATVs for utility purposes, most walk or ride in skiffs. This exemplifies the town's less complicated lifestyle than Sitka, for example, or Hoonah. Residents heat with wood and oil, grow vegetables, harvest local plants and rely on fish and game resources to supplement family diets.

Many residents have a tendency to be independent self-starters who are able and willing to do things for and/or by themselves. Families build their own homes, dress out deer, cut cordwood, put up preserves and so on. There is at the same time a strong cooperative spirit in the community, and while residents respect one another's property and privacy, they quickly join efforts in fire fighting, search and rescue and the like.

This comprehensive plan is for the incorporated area of the city and takes into account related areas immediately outside the city.

II. ATTITUDES AND VALUES

The community wishes to maintain its small town atmosphere and foster respect and concern for people in all walks of life. The majority of residents favor a stable population and economy, targeted to improving the quality of life and living standards of existing residents. They desire to enable its citizens to enjoy a clean and healthy environment that upholds quality family life. The community recognizes the need to enhance the quality of life through arts and crafts by funding the Port Alexander Arts Commission. The community wishes to maintain the opportunity for residents to participate in a subsistence lifestyle. They wish to enable all of its citizens to have access to high-quality education at all levels.

III. HISTORICAL SETTING

Port Alexander was first settled in the early 1900's by, as legend has it, halibut schooner fishermen who stumbled upon the rich bottom fishing grounds of Chatham Strait and Cape Ommaney by accident. In 1915 the first resident fish buyer established an operation at Port Alexander. His name was Karl Hansen. He set up service the growing salmon troll fleet that used Port Alexander as a home harbor during the summer and early fall salmon season. Since then, Port Alexander and the waters around it have traditionally been the home grounds for salmon trollers in south Chatham Strait and in the "outside" waters around Cape Ommaney. A large herring fishing fleet utilized the harbor as well in the 1920's and 1930's during the heyday of herring fishing.

During the 20's and first half of the 30's, Port Alexander was a sizeable town, with summer population of a thousand or more and winter population of several hundred. A report by a U.S. Forest surveyor in 1931 listed 47 residents on the eastern shores of the harbor, 20 on the western shore, 8 stores, 1 church, 1 dairy, 16 boat houses, 4 cafes and restaurants, 2 bakeries, 1 pool hall, 1 barber shop, 3 docks, 1 Standard Oil dock and plant

Draft Copy 1-25-02

3/19

Appendix G—Response to Comments

PORT ALEXANDER COMPREHENSIVE PLAN

and 2 fish buying scoops. As the salmon and herring stocks dwindled in the 1940's, so did the town's population. By the early 60's only a few families lived in Port Alexander full time, and throughout that decade the population hovered at about a dozen. There was no operational fish plant then and no businesses. Fishermen and retired people comprised the population. Many of the residences and buildings and an extensive boardwalk that circumscribed the "back lagoon" and tied in with the trail to Ship's Cove in nearby Port Chatham were constructed on land belonging to the U.S. Forest Service. During the late 60's U.S. Forest Service personnel burned many of these structures.

Beginning in the early 1970's Port Alexander experienced a resurgence due mainly to the reopening of the Bureau of Land Management Town site on the western shore of the harbor. In 1971, the BLM held a land sale for survey lots in the city. About that time there was renewed interest by the public in the Townsite Homestead Act which had been operative since the 1930's. It made land in the 64 acre Tract B townsite available for settlement and development by individuals who staked out homesteads and improved upon them.

An increase in the salmon stocks revitalized the fishing industry in the area and a salmon cold storage plant began operating again about that time. In the mid to late 70's an influx of young people and families, attracted by the location, the good fishing, the relatively inexpensive land and the opportunity to live a lifestyle different from most of 20th century America, swelled the population. By 1980 the year-round population was about 100. Pelican Cold Storage closed its plant in 1982. The new school building was opened in 1985. The community water system was started in 1985. The chlorination system was completed by 1990. Most houses on Tract A and B were hooked up by 1991. The post office was moved in May, 1987. Telephones were installed on Tract B in 1988. Two of the Cold Storage buildings, including the privately owned general store, burned to the ground January 1990. The fuel dock was closed in 1992. Population was 119 in 1995 and 81 in the year 2000. Bear Hall was built in 1932 and has 1,347 square feet.

IV. ECONOMIC BASE ANALYSIS

A. ECONOMIC BASE GOALS

The community encourages economic activities that produce high-quality goods or services and that contribute to a stable, long-term, local economic base. The community recognizes the need for economic activities that are compatible with the diversity and integrity of the ecosystem. The community wants to encourage economic activities that protect the health and well being of local people and their surroundings. The community desires to encourage economic activities that maintain Port Alexander's small town character. The community wishes to encourage economic activities that are compatible with subsistence opportunities and activities of local residents. The community desires economic activities that retain commercial fishing as part of its economic base.

B. ECONOMY

1. Employment:

Some residents are self-employed fishermen with their own boats, although some residents hire on as deckhands or as workers for the Seafood buying scow that operates in the summer months. The non-fishing jobs in Port Alexander are mostly private, government or State-related. Private businesses include several stores, a sawmill and cottage industries. Many residents are self-employed as general laborers. People also work at the Post Office, school and in municipal public works such as clerical, maintenance and chlorination.

Overall, the desire and inclination of residents seems to be individualistic, self-sufficient and thrifty. There is a great deal of cooperation among residents in many endeavors throughout the community. Residents work and barter together to keep this town economically independent and thriving. Beginning January 1, 2000, the City

Draft Copy 1-25-02

3

4/19

PORT ALEXANDER COMPREHENSIVE PLAN

increased the sales tax from 2% to 4%. A bed tax of 6% was instituted on September 3, 1998.

2. Fishing:

Salmon trolling and longlining are the main reasons for the community's economic existence at present and in the immediate future. The majority of the community rely on either or both of these for their livelihood. Fishing is highly compatible with the nature of most of the residents of the community who seem to prefer to remain as economically self-sufficient as possible. Since the advent of limited entry in the power troll fishery in 1973, the tendency has been toward greater regulation of trolling. Hand trolling also came under the limited entry system in 1980.

Presently, the majority of Port Alexander salmon trollers are power trollers. As trolling became more regulated in the 1980's and 90's, more Port Alexander residents turned to longlining for halibut, black cod and rockfish to supplement their trolling income. In 1995, the halibut and black cod longline fisheries were regulated under a form of limited entry called Individual Fishing Quotas. The IFO system has limited the number of fishermen and crew participating. There are plans for limited entry on the rockfish longline fishery also. In recent years some residents have been dingle barring for lingcod. A few boats have done some commercial shrimp and diving for sea cucumbers.

3. Tourism:

Tourism has become a major part of coastal Alaska's economy. Bed and Breakfast accommodations, lodges, and fishing charters have become prevalent in larger communities and are slowly appearing in remote villages. Some residents have acquired "six-pack" licenses for charter fishing. Spurring these changes is a possible moratorium on entrants into the charter industry and the money that can be made in this type of fishing operation. The discussions of tourism in Port Alexander have always included stressing the need to preserve its rural, community-oriented atmosphere. Residents enjoy their privacy and do not like to see it threatened. It is necessary to protect and maintain locally owned businesses in which the residents have a means to earn a living. The city has taken steps to regulate tourism by adopting Resolution 99-1 defining its position on tourism and enacting a zoning ordinance (98-10).

4. Timber and Mineral Resources:

There are no known deposits of oil or minerals in the area, neither are there any economically harvestable stands of timber on southern Baranof Island, primarily because of the steep mountainous terrain. Additionally, the U.S. Forest Service has classified the southern end of the island as LUD ("land-use designation") II. LUD II is a resource protection classification which prohibits logging, road building and recreational facilities development, but allows improvements such as hatcheries. These facts, coupled with the desire of the people to keep the surrounding country undeveloped by humans and in its pristine condition, keep these resources out of the economic picture of the community.

Some residents have taken advantage of the Forest Service system of issuing Free Use permits for harvesting timber on National Forest land for personal use. These types of harvests have increased because of the location of a privately owned Volkswagen sawmill in Port Alexander.

In 1997, a log salvage license, with rights to beaches in proximity to Port Alexander, was issued to a private party. The State retained and expanded its interest in beaches used by local residents generally for gathering of firewood. Logs on these beaches are available for personal use. The City office has the location descriptions and a map of this area.

Draft Copy 1-25-02

4

5/19

PORT ALEXANDER COMPREHENSIVE PLAN

5. Cottage Industries:

The number of talented artists, crafters and woodworkers in Port Alexander is astounding for its population. Many of them employ their talents for economic gain through local and outside markets. The residents have a chance to sell their crafts at an annual bazaar.

PORT ALEXANDER COMPREHENSIVE PLAN

COMPREHENSIVE PLAN

I. LAND USE ELEMENT

PRESENT CONDITIONS: Port Alexander is situated around a bay located on the southern tip of Baranof Island with its entrance to the south and extending north in a series of two harbors and the Back Lagoon connected by narrow, shallow guts.

The Back Lagoon is basically uninhabited, with the exception of one residential lot and one city-permitted commercial barge. Thus the majority of the population is on the east and west banks of the first and second harbors.

The east shore, Tract A, adjoins the state floats and connecting boardwalk. Tract A consists of privately owned lots and city lots, two gift stores and a grocery store, and a state-funded school. The post office and community hall are also located here. The city has two parks: Bader Point Park and Franz Island Park.

Tract B lies on the west shore separated from Tract A by the bay. Tract B consists of privately owned wooded lots (mostly beach lots) and home site lots lying beyond to the Forest Service boundary. On Tract B, a newly upgraded boardwalk connects most homes.

531 acres of Forest Service land was set aside for land selection by the State of Alaska as National Forest Community Grant #120. The City selected 10%, or 53 acres (Parcels 1-5), which after boundary adjustments equalled 54.72 acres +/-.

Parcels 1 and 2 are Lots 1 and 2, or the Boat Graveyard in the Back Lagoon. Parcel 3 is right-of-way "A" that is located on the south side of the creek and inlet just west of the Boat Graveyard. Parcel 4 is +/- 22.00 acres located on the north and east sides of the Back Bay and includes the Port Alexander Memorial Cemetery. The cemetery was approved in 2000, with a policy and action plan. Parcel 5 is approximately 22.00 acres located past the south end of the Tract B boardwalk.

Tentative approval for a Patent for the State was received from BLM on May 17, 1984. (The State (DNR) cannot issue patent to the City until a Federal (BLM) patent is issued to the State). A Patent was issued to the State for Parcels 1-3 on August 23, 1985.

Under the amended municipal general grant land entitlement law, AS 29.65.020, the City was certified an entitlement of 53 acres on June 9, 1988. No appeal on the decision was filed and effective Sept. 17, 1993, the City received management authority for the +/- 54.72 acres.

On November 16, 1993, the City received Patent to Parcels 1-3. When BLM issues a Patent for Parcels 4 and 5 to the State, DNR will send a survey request form to the City and the City can commence surveying the remaining land at that time.

A. GENERAL LAND AND WATER USE

1. Goal: To guide the orderly and efficient use of private and public land and water in a manner that maintains a small town environment and enhances the quality of life for present and future generations without infringing on the rights of private landowners.

2. Goal: Land and water use decisions will be in compliance with all applicable land and

Draft Copy 1-25-02

5

6/19

6

6

7/19

Appendix G—Response to Comments

PORT ALEXANDER COMPREHENSIVE PLAN

water use laws and policies and will carefully consider recommendations by both organized groups and individuals.

3. Goal: The City should strive to resolve conflicts, through a public process, between residential, commercial, recreational and industrial land uses.

a. Objective: The city has adopted a zoning ordinance. It will use the procedures therein to resolve conflicts between residential and commercial uses on a case by case basis.

b. Objective: The City should strongly recommend that no subdivision of existing parcels of land occur, because too much subdividing will strain the city budget for maintaining the existing water system and the limited funding resources.

c. Objective: Support the consolidation of lots under 1/8 acre size into larger parcels in order to reduce building density.

d. Objective: Further growth of the City through a State land lottery is not recommended. Community needs and the ability of the City to provide services should be considered. This is congruent with the community's desire for a stable population.

4. Goal: The maintenance of subsistence resources is one of the community's highest priorities.

a. Objective: Recreation and subsistence uses of public land and water shall be taken into account in all land and water use decisions.

b. Objective: The City will work with the Alaska Department of Environmental Conservation to ensure that air and water quality will be protected in all areas.

5. Goal: The City shall, in conjunction with the Forest Service, the State and private landowners, cooperate on land and water exchanges and easements that will benefit all.

a. Objective: The City should continue efforts to gain control of State and City selected lands.

b. Objective: Public access to waterfront will be maintained where ever feasible.

6. Goal: Survey two acres of cemetery in Summer 2002.

Draft Copy 1-25-02

7

8/19

PORT ALEXANDER COMPREHENSIVE PLAN

B. COMMERCIAL LAND AND WATER USE

1. Goal: Commercial and industrial developments shall be of a quality and scale that do not adversely impact any adjacent recreational, residential, and subsistence use areas.

a. Objective: Commercial and industrial developments shall strive to preserve the unspoiled rural ambience of the community.

b. Objective: Master planning for commercial and industrial developments shall be sensitive to multiple uses.

c. Objective: Industry shall be clean and minimize pollution and adverse impacts on surrounding land and water uses.

d. Objective: Potential enterprises shall not degrade the natural habitat.

e. Objective: Cottage industries shall be encouraged.

C. PUBLIC LAND AND WATER USE

1. Goal: The disposal or acquisition of City lands shall take into consideration present or future needs for public uses such as parks and public recreation facilities.

a. Objective: Maintain present City-owned lots in natural state until such time as a need for sites for public facilities arises.

b. Objective: Encourage the State to keep the Back Lagoon area undisturbed for recreational and subsistence uses.

c. Objective: Preserve the Back Bay area for recreational and subsistence uses.

d. Objective: Continue to seek funds for the construction of a public dock for Tract B.

e. Objective: Set aside a city lot on Tract B for the voluntary construction of a playground and/or playing field.

f. Objective: Continue to work with the State of Alaska to secure easements on all trails, streams and tidelands on State lands for public access

g. Objective: Maintain state ownership and cooperate in maintenance of public docks.

h. Objective: Design an Alaska Coastal Zone Management Plan to designate special areas and guidelines for development.

2. Goal: Manage State lands and waters in Port Alexander for Habitat and Harvest designations, according to the Northern Southeast Area Plan.

8

9/19

PORT ALEXANDER COMPREHENSIVE PLAN

II. UTILITIES ELEMENT

A. SEWAGE

PRESENT CONDITIONS: Due to the recent building activity in the city, sewage disposal systems are in various states of development with intentions of upgrading to septic tanks or composting toilets of various kinds. The combination of dry or soil conditions and relatively low per capita income places serious limitations upon any community sewage disposal system in Port Alexander.

1. Goal: Insure that sanitary waste disposal systems are adequate to protect human health, are on a scale which residents can afford and have minimal impact on the natural environment.

B. ELECTRIC POWER

PRESENT CONDITIONS: There is no "city" power generation system. The City voted on Oct. 5, 1993 for Tlingit-Haida Regional Electrical Authority to be Port Alexander's public utility. In February 1996 THREA notified the city that it was not feasible for them to provide power to the community. The community currently relies on private power sources for household needs.

The school has a 30 kW diesel generator operating during school hours. Bear Hall runs its generator when necessary. In addition, there are numerous private gas and diesel generators of 20 kW or smaller. Many residents also have battery systems to help contribute to their power resources. While most generators are run on a daily basis, few are run more than 12 hours at a time.

1. Goal: Insure that electric power generating systems are as unobtrusive as possible in operation.
2. Goal: The community will promote awareness of alternatives to fossil fuel power sources leading to adoption of such sources in the future (wind power, solar, hydro-electric, tidal, etc.)

C. WATER

PRESENT CONDITIONS: Every home on Tract A and Tract B, except for a few small cabins, are currently tapped into the water distribution system. A small dam, on the west side of the harbor, provides water to a 125,000-gallon water tank. The water flows through a buried and insulated gravity-flow transmission system and passes through a chlorinator that was installed in 1988. In 1998 a cartridge and bag filter assembly was added to the system. The City has a 6-acre reservoir, also on the west side of the bay, which serves as a reserve supply of water when needed. Water from the reservoir is gravity or fuel-power pumped and is chlorinated. The city is mandated by the Federal Government's Surface Water Treatment Act. It will be in compliance when the new contact chamber goes on line. In March or April of 1994, the water main that crosses the gut was extensively repaired and buried. In 2001 a contact chamber, new chlorinator building and a utilidor were constructed. Completion and hook-up will be done as soon as money becomes available.

Draft Copy 1-25-02

9

10/19

PORT ALEXANDER COMPREHENSIVE PLAN

1. Goal: Provide and maintain a good and healthy water service to all of Port Alexander.

a. Objective: Improve and maintain existing water lines to conserve water resources.

2. Goal: Insure that all residents have an adequate and safe water supply.

a. Objective: Discourage rapid residential and commercial growth and expansion to maintain adequate service to all members of the city.

b. Objective: Complete upgrade for contact chamber to go on line.

c. Objective: Comply with mandated Surface Water Treatment Act.

D. SOLID WASTE

PRESENT CONDITIONS: The present system of individual disposal seems adequate at this time.

1. Goal: The city and its residents shall abide by state and federal laws concerning solid waste disposal to the best of their ability.

a. Objective: Facilitate cleaning of all public areas of the City, especially floats and boardwalk areas.

b. Objective: Encourage individuals to transport their recyclables and hazardous waste to a larger community where proper disposal facilities exist. Continue the hazardous waste clean-up through our Biannual Coastal Recycling Day grant funded by the National Fish and Wildlife Foundation.

2. Goal: Research and investigate a better way of dealing with the community's solid waste.

III. COMMUNITY FACILITY ELEMENT

PRESENT CONDITIONS: Community facilities include the city-owned Community Building (Bear Hall), the library, the fire and first aid stations, and the state-funded school. Located on city property, Bear Hall contains the city office, a library, a restroom, as well as a meeting and dance hall area with sound and video equipment belonging to the Arts Commission. In 2001, Bear Hall converted from wood to oil heat. The city is building a new fire shed on city property adjacent to Bear Hall. The post office is presently located on private property. The Conex oil spill response equipment is located by the old fire shed on Tract A.

The old and new schools are located on state school district property next to Bear Hall. The school buildings, built in 1979 and 1985, are occasionally used by the community for recreation, concerts, classes and other community activities. It is also equipped with a darkroom and an internet satellite dish. The City barge was sold to a private individual in 1999.

1. Goal: Any improvement or expansion of public facilities shall be consistent with the city's ability to pay for or otherwise obtain.

Draft Copy 1-25-02

10

4/19

Appendix G—Response to Comments

PORT ALEXANDER COMPREHENSIVE PLAN

1.G.a) Maintain the peaceful character of the community and protect the natural habitat by prohibiting off-road recreational riding in motor vehicles on public land.

2. Goal: Provide access to all parcels in the city limits.

a. Objective: Continue to work with the State of Alaska to secure easements on all trails, streams and tidelands on state lands for public access.

b. Objective: The City shall develop and maintain established right-of-ways.

c. Objective: Residents living along non-developed right-of-ways should seek council approval for clearing streets, roads and right-of-ways.

B. TRANSPORTATION SERVICE

PRESENT CONDITIONS: Air service is provided by biweekly scheduled flights or passages and freight from Sitka. Additionally, a second air taxi in Sitka provides charter service. Since July 1999, an 86-ft. m/v Eyak has been providing freight, fuel, mail and passenger services to the community. In January 2001, the Eyak was awarded a two-year mail contract.

1. Goal: Insure that the city continues to receive adequate transportation service.

a. Objective: Continue to encourage boat owners to keep landing zone and seaplane float clear for air service.

b. Research limiting hours of operation for floatplanes.

c. Educate air carriers to do a fly over before landing.

d. Encourage City to work with pilots to mitigate noise and safety concerns of the community.

e. Research a safety lighting system for air traffic.

IMPLEMENTATION

Following the adoption of the plan, several planning programs can be used for its implementation:

Zoning
Subdivision regulations
Capital improvement programs
Land management plan

Draft Copy 1-25-02

12

13/19

PORT ALEXANDER COMPREHENSIVE PLAN

2. Goal: Convert old fire shed into facility for water utility storage.

3. Goal: Research health facility.

IV. HOUSING ELEMENT

PRESENT CONDITIONS: Houses are single-family residences. Some homes are periodically rented. There are accommodations for visitors. Almost half of the houses are uninhabited for most of the year. Houses are generally frame built with wood exteriors. The community discourages mobile homes and trailers. Construction of new homes, addition to, and remodeling of older ones keeps local carpenters reasonably busy. Presently the City has Ordinance 98-10 prohibiting the siting of floathouses in the city limits of Port Alexander.

1. Goal: Provide for the continued dominance of single-family dwellings built in harmony with the rustic character of the city, with its existing structures, and with the surrounding natural environment.

a. Objective: It is strongly recommended that all residences be single-family dwellings exclusively.

b. Objective: Construction of lodges and cottages for paying visitors should be small scale and kept to a minimum in order to maintain residential character and preserve the rural quality of life.

VI. COMMUNITY CHARACTER/CHANGE ELEMENT

PRESENT CONDITIONS: The residents of Port Alexander place a high value on their current way of life, and they do not wish to encounter sudden changes in the community that would result from accelerated settlement. Residents realize that change will occur, but they wish to manage it in such a way that growth is incremental, and growth is in accord with community values and municipal policy.

1. Goal: Maintain the character and stability of the community.

VII. TRANSPORTATION ELEMENT

A. CITY RIGHT-OF-WAYS

PRESENT CONDITIONS: The City of Port Alexander is not connected to any other community by roads. It is dependent entirely on air and sea transportation. There are no roads within the city. Travel is on gravel or dirt right-of-ways and boardwalks. This system of boardwalks and trails that serve the city will continually be upgraded and expanded. Privately owned backhoes have been used for construction. ATV's, garden tractors and motorized wheelbarrows are in common use for transporting freight. Vehicle use shall be restricted to utility purposes. Speed not to exceed 5MPH for safety reasons.

Draft Copy 1-25-02

11

12/19

PORT ALEXANDER COMPREHENSIVE PLAN

I. ZONING

For Port Alexander, the form of a zoning ordinance is simple. There is no need for a complicated zoning system and many regulations. Our ordinance provides for a single residential zone. Some uses are permitted, and others that are not are required to obtain a conditional use permit issued by the city's Planning Commission. The commission will permit only if the proposed use is compatible with the comprehensive plan, and meets certain standards such as lot size and noise levels that are set down in the ordinance, as well as state and federal regulations that apply.

The purpose of the zoning ordinance is to provide sustainable long-term development in the City of Port Alexander in a manner that is consistent with the City of Port Alexander's Comprehensive Plan, and that it will provide for residences, small businesses, and other development beneficial to the community. The zoning ordinance was enacted due to concerns about the possibility of a high influx of tourism into and around the community.

II. SUBDIVISION STANDARDS

A subdivision ordinance is used to prevent overcrowding. This ordinance establishes standards for the lot sizes and number of livable dwellings per lot.

III. CAPITAL IMPROVEMENT PROGRAM

Ordinance 3.03 of the Code of Ordinances sets forth the procedure for presenting capital improvements to the City Council. This section III should be reviewed and updated annually. Needed Capital Improvements, as identified during the reviews, will be listed here.

- A. Continue to develop plans for Tract B skiff dock.
- B. Construction of boardwalk continuation at the north end of Tract A.
- C. Replacement of Tract B fire shed.

IV. LAND AND WATER MANAGEMENT PLAN

The land and water management plan will offer direction for city held land and water. Needed land and water management plans, as identified during the reviews, will be listed here.

- A. Develop a land use plan for the city to donate a lot to the historical society for the use of a museum.

Draft Copy 1-25-02

13

14/19

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907/568-2207

ORDINANCE 98-10

AN ORDINANCE AMENDING TITLE 6 OF THE CODE OF ORDINANCES ADDING CHAPTER 6.03, LAND USE CODE.

BE IT ENACTED BY THE COUNCIL OF THE CITY OF PORT ALEXANDER:

Title 6 of the Code of Ordinances of the City of Port Alexander, Alaska is hereby amended adding Chapter 6.03 as follows:

Sections:	6.03.01	Purpose
	6.03.02	General Provisions
	6.03.03	Residential Zone
	6.03.04	Conditional Use
	6.03.05	Conditional Use Permits
	6.03.06	Appeals
	6.03.07	Definitions
	6.03.08	Review

6.03.01 Purpose The Purpose of this ordinance is to provide sustainable long-term development in the city of Port Alexander in a manner that is consistent with the City of Port Alexander's Comprehensive Plan, and that it will provide for residences, small businesses and other development beneficial to the community.

6.03.02 General Provisions

1. The City of Port Alexander shall be comprised of a single residential zone.
2. Only one single family dwelling and one guest house shall be permitted on a single lot of record within the residential zone.
3. The stinging, anchoring or use therein of float homes in the city limits of Port Alexander is prohibited.

6.03.03 Residential Zone**Permitted Use**

Single family residences
Guest houses
Home occupations
Cottage industry
Domestic log milling
Gardens including commercial agriculture
Retail sales

Accessory Uses: Accessory uses include, but are not necessarily limited to: Barns, Gearsheds, Woodsheds, Greenhouses, Smokehouses, Tool sheds, Steamboats, Saunas, Potting Sheds, Workshops, Boothouses, Chicken coops, Rabbit hutches, and Personal boat haulouts.

15/19

1

Appendix G—Response to Comments

Dimensional Requirements:

- All existing lots of record shall remain legal. The minimum lot size is 1/8 acre, 5,000 square feet for all lots platted after the effective date of this ordinance.
- Non-conforming lots of record. Notwithstanding the establishment of a minimum lot size, all permitted uses and accessory uses may be erected on a lot legally subdivided before the adoption of this ordinance. All conditional uses may be applied for on a legal lot of record except that Guest Lodges may only be approved on a lot that is 20,000 square feet or larger.

6.03.04 Conditional Uses: The following conditional uses including, but not limited to the following, may be permitted in the residential district. The Planning Commission may establish such reasonable conditions as necessary to assure that the conditional uses are in harmony with the residential zone.

- Guest Lodges - To preserve community values, maintain residential character, preserve rural quality of life. To limit sudden changes to the community, to encourage small business and preserve rural quality of life, but not intended to limit competition in the lodge industry, Guest Lodges are subject to the following provisions:
 - Guest lodges may have no more than 6 clients at a time
 - One guest lodge per person or entity is allowed
 - Minimum lot size is 20,000 square feet to prevent the clustering of guest lodges in one neighborhood.
- Charters - Subject to the following provision. No person or entity operating boat charters from Port Alexander may have more than 6 clients on board at a time. Operating boat charters from Port Alexander includes but is not limited to utilizing any land or dock within the limits of Port Alexander in connection with or support of the boat charter.
- Bed and Breakfast Establishments
- Churches
- Kennels
- Apiaries
- Commercial Sawmills
- Public buildings and other public offices
- Port and harbor facilities including, but not limited to, boat docks, float plane docks and barge landings.
- Marine fuel and watering stations
- Public, private and commercial moorage
- Seafood processing plants, cold storage and ice making facilities
- Warehousing, handling and storage of cargo
- Marine ways, ship repair yards and boat storage yards
- Radio towers, transmitters and relay stations, microwave relays and other telecommunications equipment and infrastructure
- Public uses including landfill cemetery utilities
- Industrial uses and activities
- Floating structures intended for commercial purposes

6.03.05 Conditional Use Permits

Purpose: The Purpose of a conditional use is to permit flexibility in the zoning code by allowing for certain uses not permitted outright in the residential zone, but which may be suitable on a limited basis under certain conditions. Uses that may be considered are those listed 'above under Conditional Uses.

Criteria for Approval: After a public hearing, the planning commission must consider the following criteria and issue related findings before a conditional use permit may be issued or denied.

- The proposal is consistent with the Port Alexander comprehensive plan and any relevant provisions of the city code of ordinances.
- The proposed use would not adversely affect the health, safety or welfare of persons or adjacent property, surrounding area and Port Alexander.
- Water service to the proposed use is adequate, or will be made adequate by the applicant, and the proposed use will not adversely affect water system pressure or capacity.
- The proposed use will not significantly degrade water, air, land or habitat quality.
- The proposed use will neither significantly impact the residential areas, small business and rural quality of life in Port Alexander nor create sudden, accelerated changes in the growth and development of Port Alexander.

Procedure: An application for a conditional use permit must be filed with the city clerk on a form to be provided by the city at least three weeks prior to the next scheduled planning commission meeting. All applications must include a site plan drawn to scale showing:

- North arrow and map scale
- Location of property lines
- Location of existing and proposed structures and their distance from lot lines
- Location of easements or other improvements on the property
- Location of the proposed use or activity

Notice: Notice of a conditional use hearing before the planning commission shall be posted in the same manner provided for city council meeting notices and shall include a description of the proposal and it's location.

Review: The planning commission shall review the application according to criteria in the zoning ordinance and criteria, and shall approve or deny the application by motion.

Conditions: The planning commission may establish reasonable conditions when issuing a conditional use permit. This may include, but are not necessarily limited to; hours of operation, or screening or buffering to protect the values of the residential zone.

6.03.06 Appeals: Appeals of a planning commission decision must be made in writing to the city clerk within 30 days of the date of the planning commission decision, and be accompanied by a non-refundable filing fee of \$20.00. All appeals must be in writing and must specify in detail all objections to the decisions being appealed. The city council sitting as a board of adjustment will hear the appeal.

The Board of Adjustment shall follow these procedures for its meetings:

- The mayor or the mayor's designee shall preside over meeting of the board of adjustment.
- The board shall consider the written appeal, together with pertinent transcripts, minutes, motions and other records of the planning commission's approval or denial.
- The board of adjustment shall make its decision based on the record. If the record is inadequate to make a decision, the board of adjustment shall hold a public hearing to hear additional evidence before making a decision.
- Notice of board of adjustment meetings must be posted for 15 days before the hearing in the manner provided for city council meetings. Written notice must be given to the appellant and the applicant.

17/19

16/19

6.03.07 Definitions

Accessory Uses. Uses that are incidental to permitted uses, are typical and customary, and can be constructed without public notice or review.

Bed and Breakfast. A single family residence in which the owner permanently resides, and which has two or less bedrooms available for guests.

Commercial Agriculture. Raising produce, fruit and/or plants for sale.

Conditional Uses. These are uses that can be approved in the residential zone if certain conditions are met which help assure the use will be compatible with the purpose of the zone.

Cottage Industry. Manufacture of crafts and goods in a private residence that is clearly secondary and incidental to use of the property as a residence.

Domestic Log Milling. Production of cants or rough-cut lumber for personal use.

Entity. A real being; existence. An organization or being that possesses separate existence for tax purposes. Examples would be corporations, partnerships, estates and trusts. The accounting entity for which accounting statements are prepared may not be the same as the entity by law. "Entity" includes corporation and foreign corporations; Not-for-profit corporation; profit and not-for-profit unincorporated association; business trust, estate, partnership, trust and two or more persons having a joint or common economic interest; and state, United States, and foreign government. An existence apart, such as corporation in relation to its stockholders.

Fleet Homes. Any floating structure primarily designed, intended or fitted out primarily as a residence or place of habitation. This does not apply to live-aboard boats.

General Provisions. Provisions which apply to all uses and activities within the zone.

Grandfather Right. Rights-structures, uses, lots- that are physically existing at the time the law was adopted or changed.

Guest House. A second residential dwelling on a lot of record used to house family members, not for transient occupancy.

Guest Lodge. A structure or structures providing transient occupancy, and that may offer related services such as food and beverages, to visitors.

Home Occupation. A service or good that is offered for sale from a private residence. Use of the structure for the sale of goods and services must be clearly secondary to residential use.

Industrial Uses and Activities. A use or activity that involves the manufacture of finished products or parts, including processing, fabrication, assembly, treatment, packaging, incidental storage, sales, and distribution of such products, and does not include commercial activities conducted by residents in their homes, such as, but not limited to, woodworking, pottery, weaving, visual art and photography.

Lot of Record. A property recorded lot that existed before, and remains legal after zoning regulations have been adopted.

Permitted Use. A use that is permitted outright, without public notice or review.

Retail Business. A business that sells in small quantities, as opposed to bulk quantities, directly to the ultimate consumer.

Single Family Dwelling. A structure or building used to house a family unit.

Transient Occupancy. Paid use of a room in a guest lodge or bed and breakfast for a period not to exceed thirty consecutive days.

6.03.08 Review. A year after its adoption by ordinance, the Port Alexander Land Use Code is to be reviewed by public process and thereafter to be reviewed annually by the Planning Commission with any recommendations brought to the city council for further review by public process.

Upon its adoption by the City Council of Port Alexander, this ordinance becomes effective immediately.

Introduction 11/5/98
First Reading 11/5/98
Public Hearing 12/15/98
Public Hearing 11/9/98

ADOPTED by a duly constituted quorum of the City of Port Alexander, Alaska this 5th day of January, 1999.


Laura Rudeout Mayor

ATTEST:


Jackie T. Garnick City Clerk

4 18/19

5 19/19

Appendix G—Response to Comments

135

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2207

7 December 2002

Dear People,

The enclosed resolution was passed unanimously at our last council meeting. Please consider the information in your deliberations over the U S Forest Service shore line/ outfitter DEIS.

Thank you,



David Wallen, mayor

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2207

Resolution 02-16

Pertaining to The U S Forest Service
Shoreline Outfitter Proposal

WHEREAS: The U S Forest Service proposes allocating shoreline access to seven guided and unguided user groups in the seven bays of southeastern Baranoff Island including Deep, Herbert, Walter, Lucy, Conclusion/Armstrong, Port Alexander and Larch; and

WHEREAS: Four of the above listed bays have multiple unguided user groups permanently located within their geographical areas who, on a routine basis, utilize the upland areas from Patterson Bay south to Larch and even on north to Redfish Bay for a variety of purposes including subsistence hunting and gathering, recreational hiking and camping, and sport fishing; and

WHEREAS: There exist in Port Alexander several lodges and businesses catering to the commercial tourist industry who on a daily basis utilize the region from Patterson Bay to Larch Bay for purposes of 1) guided sport saltwater fishing with the extension of these groups into the shoreline zones for purposes of hiking and local exploration; 2) guided "fly in" freshwater fishing to some sites that are within the one half mile designated zone; 3) guided hunting groups in both the small and large game classification; and 4) guided walking tours of both an exploratory and educational nature; and that these groups can totally consume the guided commercial allocation for the region in even the most generous alternative for the commercial sector.

THEREFORE, BE IT RESOLVED THAT: The council for the city of Port Alexander requests that the U S Forest Service strongly consider the southeastern Baranoff Island designated zone as an area significantly utilized by the local residents and the tourist industry currently in existence in Port Alexander.

FURTHERMORE; That the local residents residing in Mist Cove during the entire salmon migration period, and on a year round basis in Little Port Walter, Port Armstrong, Port Conclusion and Port Alexander utilize Deep Bay

Shoreline OIG EIS
2.g-0047
12/07/02

RECEIVED

DEC 18 2002

PETERSBURG OFFICE
TONGASS N.F.

2/5

1/5

Response to Comments—Appendix G

for subsistence shrimp fishing and hunting especially at the head of the bay; Mist Cove for subsistence salt water fishing and hunting; Port Herbert for subsistence salt and freshwater fishing, and hunting especially at the head of the bay and in the stream drainage at the northwest end; Port Walter for subsistence salt and freshwater fishing in Sashin Creek and Lake and the other lakes and drainages in both Little and Big Port Walter, and hunting, shrimping, and subsistence clam digging especially at the site called Clam Island; hunting in Port Lucy and hiking specifically across the isthmus to Puffin Bay; Port Armstrong for subsistence saltwater fishing and beach asparagus collection, and freshwater fishing in Betty and Jetty Lakes and subsistence hunting; Port Conclusion for hunting, subsistence crabbing and shrimping, hiking and camping, and almost the entire Port Alexander community's beach asparagus collection at Ship's Cove; and south of Port Alexander and around to Larch Bay is utilized for a significant amount of hunting and recreational hiking and camping.

FURTHERMORE: That a one mile perimeter around Port Alexander for guided hunting for Brown Bear is a totally inadequate buffer zone against the potential range of wounded bears (escaping shot bears estimated by ADF&G and professional guides to range between 1 in 4 and 1 in 7) and that this buffer zone should be extended to 3 miles around all permanent sites of human habitation; and

FURTHERMORE: That the council for the city of Port Alexander has a long history of opposition to extensive especially external tourism documented through resolutions, ordinances and our comprehensive plan; that the local commercial tourist industry fully utilizes the commercial allocation under any of the proposed alternatives; and that there is a strong interest in not allowing the displacement of the private noncommercial user groups from their habitual and usual subsistence areas and purposes.

ADOPTED this 2nd day of December, 2002, at a Port Alexander City council meeting;

ATTEST:

Pharmica Garnick
Pharmica Garnick, city clerk

David D. Wallen
David D Wallen, mayor

3/5

To: The City of Port Alexander
U.S. Forest Service; Sitka Ranger District
October 29, 2002

This petition is in regards to the Article regarding Forest Service Picks Sites in SE for Tours. The following Signatures are NOT in favor of the Forest Service Issuing permits to large commercial tour groups enabling them to disembark the ship from GUT BAY South around Baranof Island and up to Larch Bay. These areas are used highly for subsistence hunting and fishing. We believe these large groups would be detrimental to our way of life. Thank you for your time and consideration.

1. Molly Kinzen
2. PHARMICA GARNICK
3. PHARMICA GARNICK
4. Linda Lawson
5. Steve E. Bannick
6. Janette Hendrickson
7. James Hendrickson
8. Lucas C. McConnell
9. Mary Lou Miller
10. Patrick Miller
11. Jimmy Miller
12. Jimmy Miller
13. Jimmy Miller
14. David D. Wallen
15. David D. Wallen
16. Jane Langley
17. Paul N. Z...
18. Jerry L. Ellis
19. William S. Patrick
20. Kimberly Swisher
21. Will O. Swisher
22. Dr. H. D.
23. William E. S. S.
24. Steven P. Little (WFS)
25. Steven P. Little (WFS)
26. Steven P. Little (WFS)
27. Steven P. Little (WFS)
28. Steven P. Little (WFS)
29. Steven P. Little (WFS)
30. John W. Larson
31. Wayne Vargason
32. David D. Wallen
33. Karen Moley
34. Karen Moley
35. Karen Moley
36. J. Helen Tuck
37. Karen Moley
38. Karen Moley

4/5

Appendix G—Response to Comments



02 DEC 17 AM 9:34
GOVERNMENTAL

December 10, 2002

Division of Governmental Coordination
P.O.B. 110030
240 Main Street, Suite 500
Juneau, Alaska 99811-0030
Attn: Sandy Harbanuk

Dear Ms. Harbanuk,

The City of Pelican supports the Preferred Alternative (Alternative 5) with regards to Bohemia Basin.

Pelican's Coastal Management Plan states:

"Bohemia Basin is outside the City limits, but falls within the region identified in the Pelican Coastal Management Plan as the Study Area. The region surrounding the Pelican Coastal Management District is an integral part of the economy and lifestyle of the City's residents. What happens in the surrounding region can greatly affect the City of Pelican, and it is in the City's interest to be concerned with external events and exert influence when vital, categorical issues arise outside the District boundary."

Pelican Coastal Management Plan Enforceable Policy 3.1

"Recreation areas designated in the PCMP shall be protected for recreational purposes and developed for the enhancement of recreational uses."

"The West Chichagof-Yakobi Island Wilderness Area...has significant recreational value to the community."

The above policy is in line with State standard 6 AAC 80.060, RECREATION.

"(a) Districts shall designate areas for recreational use. Criteria for designation of areas of recreational use are

- (1) the area receives significant use by persons engaging in recreational pursuits or is a major tourist destination; or
- (2) the area has potential for high quality recreational use because of physical, biological, or cultural features.

(b) Districts and state agencies shall give high priority to maintaining and, where appropriate, increasing public access to coastal water.

Shoreline O/G EIS
2.9-0048
12/10/02

OFFICE OF THE MAYOR - PUBLIC WORKS DEPARTMENT - PELICAN HEALTH CLINIC - PELICAN VOLUNTEER FIRE DEPARTMENT

The wish and intent of the City of Pelican is to allow Bohemia Basin to be used as a recreational site for residents, fishermen, outfitter/guide clients and other visitors to the Pelican area. There is currently a dock located at the site that is under the jurisdiction of the City of Pelican.

Again, the City of Pelican supports the Large Group Area, Alternative 5 for Bohemia Basin.

Sincerely,

Kathie Wasserman

Kathie Wasserman
Mayor, City of Pelican

2/2



City and Borough of Sitka

100 Lincoln Street • Sitka, Alaska 99835

138

02 DEC 12 AM 10:12

December 10, 2002

Sandy Harbanuk
Project Review Coordinator
Division of Governmental Coordination
PO Box 110030
Juneau AK 99811-0030

RE: Shoreline Outfitter/Guide DEIS (Guided Recreation)
AK 0207-21JJ

Dear Ms. Harbanuk:

Administrative Services Coordinator Este Fielding and I have reviewed this Draft Environmental Impact Statement for consistency with the Sitka Coastal Management Program. Obviously a great deal of effort and expense has gone into this DEIS, and these staff efforts are sincerely appreciated. However, the draft is very large and it is difficult to review the various alternatives, especially on a site-specific basis. Much of the report is predicated on certain amounts of commercial use, but these commercial uses will be superimposed on already heavy public use of many of these areas, especially those areas within the Sitka Coastal District which receive the greatest or most outstanding, site-specific recreation and/or subsistence uses or which have very high-value resource values. Since this intensive public use is not quantified, there is a potential for considerably increased use "pressures" on certain high value areas such as the Special Management Areas identified in the Public Use Management Plan.

Special Management Areas (SMA's) are only briefly mentioned in the DEIS under one Use Area Card (04-03 Sitka Area, Appendix A page 54). SMA's occur within every Use Area Card within the Sitka Ranger District and within seven of the proposed large group enclaves. The magnitude of their significance is more than "of particular importance to residents." The Sitka District Coastal Management Program completed a significant amendment in 1993 entitled "Public Use Management Plan." The purpose of this was "to identify the *most outstanding, site-specific recreation and/or subsistence use areas* within the Sitka Coastal District outside the Sitka road system, and to propose management guidelines and/or enforceable policies for these areas to maintain existing uses and limit use conflicts, consistent with the regulatory authorities of the land and water management agencies" (Public Use Management Plan, pg. 1).

It is almost impossible to review the proposed Alternatives in relation to the Coastal Program without looking at site-specific impacts. With no idea where commercial activities might be

Shoreline O/G EIS
2,6-0049
12/10/02

Providing for today...preparing for tomorrow

11/17

Sandy Harbanuk
December 10, 2002
Page 2 of 10

permitted (except for large-group enclaves, which have boundary drawings), one can only assume that they could be permitted (except as excluded) in Special Management Areas which already are very important public-use and high-value resource areas. Since these areas are highly desirable use areas for the many participants in the Public Use Management Plan, it is likely these same destinations would be desirable to commercial outfitter-guides as well. While there is not nearly enough site-specific information to come to a conclusion about consistency with Sitka Coastal Management Program, except perhaps for the large-group impacts, there are certainly concerns about the potential for adverse impacts to users of these areas, and to the resources they include, if commercial outfitter/guide activities are conducted in these same areas. Therefore, as a general policy, it would seem prudent to not permit outfitter/guide activities that could displace public uses in the Special Management Areas unless there is clearly no significant conflict or potential for damage to the resources.

The five alternatives are too vague to effectively comment on in general, although some observations may be helpful.

Alternative 1- Current Use. Obviously this does not adequately manage outfitter/guide use of the Tongass while balancing other uses and limiting use conflicts and resource impacts.

Alternative 2 may be acceptable if concerns within the Use Area cards as stated previously are addressed and Special Management Areas are in general excluded from commercial uses if substantial adverse impacts would result.

Alternative 3. Up to 50% of the total recreation carrying capacity would be an excessive amount of commercial use considering that commercial users are a very small part of the total users of the Tongass. This probably would be unacceptable to other users due to the high possibility of conflict.

Alternative 4. Use of up to 8% of the total recreation carrying capacity is probably too restrictive on commercial use to accommodate the unmet needs and therefore may be unrealistic. However, it is an acceptable alternative from a public use/resource standpoint.

Alternative 5. This appears to be the most realistic alternative to provide both commercial outfitter/guide opportunities, which the Sitka Coastal Management Program supports for economic development reasons, and better control on where outfitter/guide activities occur. However, the final alternative should recognize existing public uses and not overly intrude into Special Management Areas or other highly significant public use/resource value areas that could be seriously adversely impacted by these commercial uses, unless it is clear no undue harm to current public use or resource values would occur.

It would be much more efficient to review proposed commercial use areas if it were known exactly where and for what use these areas will be designated, rather than leaving vast tracts of the National Forest open to potential commercial use without any specific review of impacts to that location. If the Forest Service continues to propose a region-wide opening of Tongass lands to commercial outfitter/guide uses, and selects one of the above alternatives, or a hybrid, then it should have clear policies available to denote what areas would be open to commercial uses

2/17

Appendix G—Response to Comments

Sandy Harbanuk
December 10, 2002
Page 3 of 10

based on what criteria, as well as how non-commercial, public users and the resources of these areas would be protected. At the least, it would be beneficial as a general rule to exclude Special Management Areas from commercial use unless such use (such as a small group hiking a trail) would cause little adverse impacts to other uses or resources. There should also be an opportunity for a public process to have input into issuance and renewal of outfitter/guide permits to ensure that a permit is not being misused, causing serious adverse impacts to other users, or damaging resources. Since these permits will be used in remote locations, it will be very difficult for the Forest Service to determine whether or not a specific site is suitable for a permit and to monitor what the outfitter/guide's activities under the permit cause in the way of impacts without input from other users and concerned persons, especially if there are problems.

While decisions must be made on a site-specific, project-specific basis, it is likely all alternatives should be modified so that any proposed large group enclaves do not occur within SMA's unless there is some extremely strong justification for this use and it can be demonstrated that no significant adverse impacts to public use or resource values would occur. A large group of up to 75 people can have substantially greater impacts than small groups of six or less. Large group use of SMA's other than perhaps trails is highly likely to cause adverse impacts at a level unacceptable to other users and resources.

It is the intent of the Sitka District to preserve Special Management Areas for future public use and maintenance of resources. Commercial group use proposed by the Shoreline Outfitter/Guide DEIS has a potential to significantly impact public use and resource values within Special Management Areas and the Sitka Coastal Management District as a whole. Use by commercial groups may conflict with subsistence and recreational uses by the public. Furthermore proposed large group enclaves and their use by groups of up to seventy-five people at a time may compromise habitat as well as resource values. The Sitka District is concerned about these potential conflicts and impacts. If commercial use as proposed by the DEIS is allowed, these concerns should be addressed on a site specific basis. Conflicts with public users should be minimized. Impacts to the resource (whether that may be habitat, viewpoints, recreational experience, etc.) must be minimized or at the very least least mitigated, or unacceptable harm could result.

Following is a list of the Use Area Cards within the Sitka Ranger District and the Special Management Areas that fall within them:

- 04-01A Gut Bay, Baranof
- Red Bluff Bay; Falls Lake Sockeye Stream and Lake System
- 04-01B Port Armstrong
- Sashin Lake Trail
- 04-02A Redoubt Lake
- Goddard Hot Springs; Kolosh Island; Kliuchevoi Bay; Trail to Redoubt Lake
- Kanga Bay FS Cabin
- Redoubt Lake FS Cabin and Lake; Redoubt Sockeye Stream and Lake System
- Seventyfourth Bay FS Cabin
- Taigud Islands
- West Redoubt Bay Islets

3/n

Sandy Harbanuk
December 10, 2002
Page 4 of 10

- 04-02B Whale Bay
- Avoss Lake FS Cabin
- Plotnikof Lake and Davidof Lake FS Cabins, Lakes, Trail
- Port Banks
- Redfish Bay Sockeye Stream and Lake System
- Secluded Bay (Necker Bay)/Benzeman Lake Sockeye Stream and Lake System
- Yamanai Cove and Islets; Slate Islets; Guibert Islets
- 04-03 Sitka Area
- Allan Point FS Cabin
- Brent's Beach FS Cabin and Kamenoi Beach
- Chaichei Islands; Unnamed Islands
- Fish Bay Hot Springs and Trail
- Fred's Creek FS Cabin; Mt. Edgecumbe National Recreation Trail
- Head of Krestof Sound through Dry Pass; Road to Gilmer Bay
- Iris Meadows; Shelikof FS Cabin, Trail and Bay; Road to Mud Bay
- Kakul Narrows FS Shelter
- Kalinin Bay
- Leesofskia Bay
- Magoun Islands/Port Krestof Marine Park
- Nakvasina Passage to head of Nakvasina Sound
- Neva Strait FS Shelter
- North Beach Shelikof FS Cabin
- Piper Island FS Cabin
- Pirate's Cove; Samsing Cove FS Cabin and Cove; Three Entrance Bay
- Salmon Lake FS Cabin, Lake and Trail; Trail to Redoubt Lake
- Sealion Cove and Trail
- Siginaka Islands
- Sitka Public Recreational Facilities Tidelands
- Sinituin Island
- St. Lazaria Island
- Suloia Lake FS Cabin, Lake and Trail
- 04-04A Lake Eva, Rodman Bay
- Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System
- 04-04B Kelp Bay
- Hanus Bay; Portage; Dead Tree Islands
- Kelp Bay Basin and Pond Island
- 04-04C Baranof Warm Springs
- Baranof Warm Springs FS Cabin, Lake and Trail; Sadie Lake and Trail
- 04-12 Tenakee Inlet
- Kadashun Bay
- Kook Lake FS Cabin, Lake and Trail; Basket Bay; Kook Lake Sockeye Stream and Lake System
- 04-13 Peril Strait
- Big Bear/Baby Bear Bays State Marine Park
- Fick Cove
- Lisianski River, Lake and Trail (continues into use area card 04-15)

4/17

Response to Comments—Appendix G

Sandy Harbanuk
December 10, 2002
Page 5 of 10

Moser Island FS Cabin; Adjacent Seal Rookery
Ostioia Island FS Shelter
Sitkoh Lake FS Cabins, Lake and Trail; Upper Sitkoh Bay and Tideflats; Sitkoh Lake
Sockeye Stream and Lake System
Ushk Bay
Vixen Islands Seal Haulouts
04-14 Slocum Arm
Ford Arm Sockeye Stream and Lake System
Klag Bay Sockeye Stream and Lake System
Lake Anna Sockeye Stream and Lake System
Leo Anchorage Sockeye Stream and Lake System
04-15 West Chichagof
Didrickson Trail and Lake
Goulding Lakes FS Cabin; Goulding Harbor, Trail and Lakes System
Lisianski River, Lake and Trail; North Arm Hoonah Sound Tideflats
Myriad Islands and White Sisters Islands
White Sulphur Hot Springs, FS Cabin, Lake and Trail; Mirror Harbor, Sea Level Slough;
Dry Pass Trail and Harbor

In reviewing this DEIS a primary concern is the impact of private commercial use on access and use by the public for which the SMA's are managed. The following Enforceable Policies from the PUMP and SCMP are relevant to commercial group use within Special Management Areas (and to some degree outside the SMA's as well) which may generate use conflicts between commercial groups and the recreational and subsistence users of the SMA's:

PUMP Enforceable Policy 6 Pg. 19 states in part: "Where feasible and prudent, all land- and water-based uses which conflict with the management of the Special Management Areas shall be prohibited." The SMA's are of great importance to subsistence and recreational users. They are managed with the intent of preserving the resource values for continued public recreational and subsistence use. Commercial group use which conflicts with these public uses or causes resource damage is not recommended.

PUMP Enforceable Policy 5 Pg. 18: "Where feasible and prudent, a "buffer strip" of 100 feet shall be maintained on each side of all trails listed as Special Management Areas, for the protection of the trails and the recreational experience. If it would be necessary to cause a significant adverse impact to the trail, the trail should be relocated where the buffer can be maintained. Where feasible and prudent, all viewpoints, scenic areas, and other unique recreational features of the trail shall be protected." Commercial group use could significantly impact trail condition; therefore Policy 5 applies.

SCMP Enforceable Policy 3.1 Pg. 134 is also relevant to uses within SMA's. Commercial group use should not conflict with traditional activities or compromise resource values. Adverse impacts to the resource or the experience of recreational users should be minimized or mitigated.

5/17

Sandy Harbanuk
December 10, 2002
Page 6 of 10

"To the extent feasible and prudent, the following criteria shall be utilized in land and water management decision-making affecting areas widely used for recreational purposes including, but not limited to, those areas listed in policies 3.3 and 3.4:

- 1) Habitat and access shall be maintained for traditional activities including hunting, fishing, clamming, beachcombing, hiking, nature observation, and other recreational uses;
- 2) The visual and aesthetic characteristics of recreational areas shall be protected and maintained;
- 3) The proposed use or activity shall minimize adverse impacts on recreational uses;
- 4) Significant adverse effects upon the habitat or qualities upon which the recreation depends shall be avoided or mitigated."

SCMP Enforceable Policy 3.4 Pg. 135, states: "Recreation and/or preservation of the resource shall be a high-priority use of the following heavily utilized areas within the City and Borough of Sitka, and to the extent feasible and prudent, the portions of these areas in the public domain shall be protected and maintained for recreational use:

- 1) Goddard Hot Springs (local government)
- 2) White Sulphur Hot Springs (federal government)
- 3) Publicly-owned portion of Baranof Warm Springs north of the river (local, state or federal government)
- 4) Mt. Edgecumbe National Recreation Trail (federal government)
- 5) US Forest Service Cabin sites and adjacent areas (federal government)
- 6) Other areas in the public domain may be added to this list through amendment to the SCMP."

The Use Area Cards that contain these areas are 04-02A Redoubt Lake (contains Goddard Hot Springs), 04-15 West Chichagof (contains White Sulphur Hot Springs), 04-04C Baranof Warm Springs, 04-03 Sitka Area (contains Mt. Edgecumbe National Recreational Trail).

SCMP Enforceable Policy 9.1 Pg. 96 is relevant to any area utilized for subsistence: "Land and water uses and activities within the District shall minimize and/or mitigate significant adverse impacts, including cumulative impacts, on subsistence resources and their use. If a substantial concentration of the resource could be significantly adversely impacted by a proposed use or activity, protection of the resource shall be a priority consideration. Important subsistence resources include: razor clams, black and other seaweeds, salmon (especially sockeye), halibut, deer, herring eggs, smelt, rockfish, abalone, crab, clams, shrimp, mussels, gumbosots, goat, bear, ducks and other waterfowl, berries, fur bearers, sea otters, and seals."

Likewise, SCMP Enforceable Policy 9.3 Pg. 96 is also relevant to any area utilized for subsistence: "Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law." The following SMA's receive heavy subsistence use and should be protected:

Red Bluff Bay; Falls Lake Sockeye Stream and Lake System
Goddard Hot Springs; Kolosh Island; Klischevoi Bay; Trail to Redoubt Lake
Redoubt Lake FS Cabin and Lake; Redoubt Sockeye Stream and Lake System
Redfish Bay Sockeye Stream and Lake System

6/17

Appendix G—Response to Comments

Sandy Harbanuk
December 10, 2002
Page 8 of 10

Fred's Creek FS Cabin; Mt Edgcombe National Recreational Trail
Iris Meadows; Shellkot FS Cabin, Trail and Bay; Road to Mud Bay
North Beach Shellkot FS Cabin
Piper Island FS Cabin
Pirate's Cove; Samsing Cove FS Cabin and Cove; Three Entrance Bay
Salmon Lake FS Cabin, Lake and Trail; Trail to Redoubt Lake
Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System
Baranof Warm Springs FS Cabin, Lake and Trail; Sadie Lake and Trail
Moser Island FS Cabin; Adjacent Seal Rookery
Sitkoh Lake FS Cabins, Lake and Trail; Upper Sitkoh Bay and Tidelands; Sitkoh Lake
Sockeye Stream and Lake System
Goulding Lakes FS Cabin; Goulding Harbor, Trail and Lakes System
White Sulphur Hot Springs, FS Cabin, Lake and Trail; Mirror Harbor; Sea Level Slough;
Dry Pass Trail and Harbor

The large group enclaves proposed could be heavily used by up to seventy-five people at a time. Seven of these enclaves are located within Special Management Areas. The effects of large group use on each Special Management area will differ depending on the area.

Ushk Bay Enclave #04-13. There is a large intertidal area in this SMA with concentrations of dugeness and king crab. The intertidal area and anchorage are widely used for recreational boating, camping and picnicking. Large groups at the upper end of the Bay will impact and conflict with users of the SMA. There is the potential for depletion of the crab if harvested as part of these commercial visits, whether permitted or not. The designation of this area as a large group enclave could conflict with users pursuing traditional activities such as hunting and fishing in the Bay per Enforceable Policy 3.1 of the SCMP.

Sitkoh Bay Rd Enclave #0413. The SMA consisting of Sitkoh Lake FS Cabins, Lake and Trail, Upper Sitkoh Bay and Tidelands and Sitkoh Lake Sockeye Stream and Lake System is a very important, heavily used recreation and subsistence area. It is also a highly productive estuarine system. Adjacent Florence Bay is a popular halibut fishing area. The area receives major public use and is an important bear habitat and transit area. The designation of this area as a large group enclave would adversely impact public use and resource values if this area is used partly because of the potential for conflict with recreational users and bear habitat per Enforceable Policy 3.1, and with subsistence users per Enforceable Policies 9.1 ("including cumulative impacts") and 9.3 of the SCMP.

Fish Bay 15% Enclave #0403. This enclave is located directly south of a SMA. This SMA is a popular destination in part because of the hot springs located at the end of the trail. This area is also heavily used for crabbing and shore activities. Group use should not impede access to the SMA and the hot springs per Enforceable Policy 3.1 of the SCMP. Groups should not interfere with users of the SMA and the hot springs nor adversely impact resources in the area.

Dry Pass Enclave #0403. This area has large concentrations of waterfowl and is heavily used by duck and deer hunters. It includes large, productive tidelands and unexcelled estuarine habitat. Public users should not be displaced by group use. Enforceable Policies 3.1, 9.1 and 9.3 of the

8/17

Sandy Harbanuk
December 10, 2002
Page 7 of 10

Secluded Bay (Necker Bay)/Benzeman Lake Sockeye Stream and Lake System
Brent's Beach FS Cabin and Kamenoi Beach
Head of Krestof Sound through Dry Pass; Road to Gilmer Bay
Nakwasina Passage to head of Nakwasina Sound
Siginaka Islands
Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System
Kelp Bay Basin and Pond Island
Kadashan Bay
Kook Lake FS Cabin, Lake and Trail; Basket Bay; Kook Lake Sockeye Stream and Lake System
Lisianski River, Lake and Trail
Sinitin Island
Sitkoh Lake FS Cabins, Lake and Trail; Upper Sitkoh Bay and Tidelands; Sitkoh Lake Sockeye Stream and Lake System
Ford Arm Sockeye Stream and Lake System
Klag Bay Sockeye Stream and Lake System
Lake Anna Sockeye Stream and Lake System
Leo Anchorage Sockeye Stream and Lake System

SCMP Enforceable Policy 9.2 Pg. 96 states in part: "Razor clams on Kamenoi Beach...and black seaweed...are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts." This policy is particularly relevant to the Brent's Beach FS Cabin and Kamenoi Beach SMA, where razor clams are harvested, and Sinitin Island SMA, where black seaweed is harvested. The scarcity of these resources makes their protection a high priority. Commercial group use must not compromise these resources.

SCMP Enforceable Policy 10.3 Pg. 139 is relevant to the Siginaka Islands SMA where herring eggs are harvested: "Land and water uses having the potential to significantly adversely impact habitat seasonally supporting substantial concentrations of herring eggs, shall, to the extent feasible and prudent, be designed to conserve existing habitat or mitigate significant adverse impacts." Herring eggs are a particularly sensitive and traditional resource which must be preserved. Commercial group use must not be detrimental to the habitat which supports herring eggs and their harvest.

PUMP Enforceable Policy 1 Pg 18 states: "Tidelands uses shall be compatible with the recreation nature of the upland use at public cabin and trailhead Special Management Areas." PUMP Enforceable Policy 3 Pg 18 states in part: "US Forest Service public use cabins shall be managed for recreation and conflicting uses not permitted...." It is understood in the DEIS that there will be no commercial use of these cabin sites for outfitter/guide camps. These Enforceable Policies enforce that prohibition. The following SMA's contain a cabin and/or trailhead adjacent to tidelands:

Kanga Bay FS Cabin
Sevenfathom Bay FS Cabin
Allan Point FS Cabin
Brent's Beach FS Cabin and Kamenoi Beach

7/17

Response to Comments—Appendix G

Sandy Harbaumuk
December 10, 2002
Page 9 of 10

SCMP are important in this area in regard to the access of and possible adverse impacts ("including cumulative impacts") upon recreational and subsistence users.

Eagle River Rd Enclave #0403. The Eagle River Road area is favored for coho fishing and receives extensive ATV use. Public users of the Eagle River area should not be displaced by group use. Enforceable Policies 3.1, 9.1 and 9.3 of the SCMP are important in this area in regard to the access of and possible adverse impacts ("including cumulative impacts") upon recreational and subsistence users.

Noxon (Nakwasina SMA) Enclave #0403. The Nakwasina SMA likely receives the most intensive recreational and subsistence hunting and fishing of any area in the Sitka District. The Use Area Card should reflect this intensive use. The designation of this area as a large group enclave is not appropriate because there is such a high possibility for conflicts between commercial groups and public recreational users per Enforceable Policy 3.1, as well as with subsistence users per Enforceable Policies 9.1 and 9.3 of the SCMP. By moving the large group area in Nakwasina further west, away from the major coho streams, deer hunting areas, good anchorages and major public use and uplands access areas, these conflicts could be reduced.

Lake Eva Trail Enclave #0404A. This SMA is a highly valued subsistence and recreational area due to the good salt water anchorage, stream's significant runs of steelhead and sockeye and the large run of coho, the excellent access to the Lake on the boardwalk trail, and other assets. The trail is important for subsistence and recreational users to access the stream and lake. A 100' buffer strip should be maintained on each side of the trail per PUMP Enforceable Policy 5. The designation of this area as a large group enclave is probably inappropriate because of the potential for conflict with public recreational users per Enforceable Policy 3.1, as well as with subsistence users per Enforceable Policies 9.1 and 9.3 of the SCMP. There are already public concerns about commercial use of this area, which are likely to become much bigger issues with large group use.

Hanus Bay/ Portage Arm Enclave #0404B. This area receives high recreation and subsistence use by campers, hikers, hunters and fishermen. The DEIS notes "some use" of the entire Kelp Bay area by residents of Sitka, Angoon and Warm Springs. This use is likely much broader than stated. Portage Arm has a large, productive estuary. There are major concentrations of crab, bear and waterfowl. The bay is an active fishing ground and heavily used anchorage. Having a large group enclave at the neck of Portage Arm seems ill advised. There is a high potential for conflict between public users and commercial groups. Public access will likely be impeded because public users land boats on the proposed enclave area and travel up Portage Arm. There is potential for conflict with public recreational users per Enforceable Policy 3.1. The proposed large group enclave should be located further away from this heavily used, sensitive habitat and portage area, preferably at the former LTF site which has already had major development impacts.

The above are only preliminary comments, based on a brief analysis of the presumably hundreds (thousands?) of pages in the DEIS. Much of the numerical analysis of this document is beyond my ability to meaningfully interpret. In order to determine consistency with the Alaska Coastal Management Program, specific project proposals for specific sites generating predictably

9/17

Sandy Harbaumuk
December 10, 2002
Page 10 of 10

specific impacts must be reviewed, and in general, these details are not available. Therefore, it is beyond my capacity to determine whether this DEIS is or is not consistent with the Coastal Management Program. It is likely that permitting commercial uses in at least some of the Sitka Coastal Program Special Management Areas would be inconsistent with the referenced Enforceable Policies. However, these can only be evaluated on a site-specific, policy-specific basis, and the impacts to both other users and to the environment of permitting various commercial operations in various locations may not be easily predictable except in hindsight. Therefore, it would appear wise to err on the side of caution when setting aside large tracts of lands as open to commercial activities, regardless of whether these areas already have special significance in their current state (e.g., the Special Management Areas).

We look forward to working with the Forest Service to resolve the concerns addressed in this comment letter and may submit a revised comment to the Forest Service prior to the January 3, 2003 deadline for comments on the DEIS. If there are any questions about this response, please feel free to call me at 747-1855. Thank you for the opportunity to comment.

Sincerely,


Madeline A. Campbell
Coastal Management Coordinator

Cc: Fred S. Salinas, USDA Forest Service
A.E. Zimmer, Administrator

10/17

Appendix G—Response to Comments

SITKA DISTRICT COASTAL MANAGEMENT
PROJECT 1989

2.2 POLICY: No building permit shall be issued by the municipal building official in any area containing any geophysical hazard as defined herein or as defined in any other municipal law or ordinance until the remedies for such hazards have been incorporated into the project design documents.

3. RECREATION (6 AAC 80.060)

3.1 POLICY: To the extent feasible and prudent, the following criteria shall be utilized in land and water management decision-making affecting areas widely used for recreational purposes including, but not limited to, those areas listed in policies 3.3 and 3.4:

1) Habitat and access shall be maintained for traditional activities including hunting, fishing, clamming, beachcombing, hiking, nature observation, and other recreational uses;

2) The visual and aesthetic characteristics of recreational areas shall be protected and maintained;

3) The proposed use or activity shall minimize adverse impacts on recreational uses.

4) Significant adverse effects upon the habitat or qualities upon which the recreation depends shall be avoided or mitigated.

3.2 POLICY: Recreational access to public uplands, shorelines, tidelands, and wetlands shall be maintained and enforced to the maximum extent feasible and prudent, through easements, dedications, or other means, except where human health or safety would be at risk.

3.3 POLICY: Recreation and/or preservation of the resource shall be considered the primary use of the following areas, regardless of ownership, and the areas shall be protected and developed for the enhancement of recreational use:

- 1) Sitka National Historical Park (federal government)
- 2) Pioneer Park (state government)
- 3) Moller Park (local government)
- 4) Crescent Park (local government)
- 5) Totem Square (state government)
- 6) Halibut Point Recreation Area (state government)
- 7) Sandy Beach (state government)
- 8) Starrigavan Campgrounds (federal government)
- 9) Old Sitka (state government)

134

11/17

SITKA DISTRICT COASTAL MANAGEMENT PROJECT 1989

- 10) Swan Lake A.M.S.A. (local government)
- 11) John Brown's Beach (federal government)
- 12) Mahknati Island Causeway (state government)

3.4 POLICY: Recreation and/or preservation of the resource shall be a high-priority use of the following heavily utilized areas within the City and Borough of Sitka, and to the extent feasible and prudent, the portions of these areas in the public domain shall be protected and maintained for recreational use:

- 1) Goddard Hot Springs (local government)
- 2) White Sulphur Springs (federal government)
- 3) Publicly-owned portion of Baranof Warm Springs north of the river (local, state or federal government)
- 4) Mt. Edgecumbe National Recreation Trail (federal government)
- 5) U.S. Forest Service Cabin Sites and adjacent areas (federal government)
- 6) Other areas in the public domain may be added to this list through amendment to the SCMP.

4. ENERGY FACILITIES (6 AAC 80.070)

Electrical

4.1 POLICY: The municipality identifies the Takatz Lake watershed for a proposed hydroelectric power site as the highest priority use for this site and shall oppose any other conflicting land use classification or proposed uses of the Takatz Lake watershed as long as this designation exists. Interim, non-conflicting uses for Takatz Lake may be permitted.

Fueling Facilities

4.2 POLICY: Fueling facilities must be constructed to include a barrier or other safeguard to prevent any spill from entering coastal waterways or wetlands.

5. TRANSPORTATION AND UTILITIES (6 AAC 80.080)

5.1 POLICY: Following construction, intertidal or beach areas must be cleaned and restored to acceptable aesthetic conditions.

135

12/17

Response to Comments—Appendix G

DEFINITION: Alaska Statute Title 16, Section 16.05.940, Definitions:

"(23) subsistence uses means the noncommercial, customary and traditional uses of wild, renewable resources by a resident domiciled in a rural area of the state for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles out of nonedible by-products of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption; in this paragraph, family means persons related by blood, marriage, or adoption, and a person living in the household on a permanent basis."

Enforceable Policies

9.1 POLICY: Land and water uses and activities within the District shall minimize and/or mitigate significant adverse impacts, including cumulative impacts, on subsistence resources and their use. If a substantial concentration of the resource could be significantly adversely impacted by a proposed use or activity, protection of the resource shall be a priority consideration. Important subsistence resources include: razor clams, black and other seaweeds, salmon (especially sockeye), halibut, deer, herring, eggs, smelt, rockfish, abalone, crab, clams, shrimp, mussels, gunboats, goat, bear, ducks and other waterfowl, berries, fur bearers, sea otters, and seals.

9.2 POLICY: Razor clams on Kamenoi Beach (the only known major concentration in the District) and black seaweed (available at only a few privately known locations in the District) are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts to the resource.

9.3 POLICY: Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law.

9.2 POLICY: Razor clams on Kamenoi Beach (the only known major concentration in the District) and black seaweed (available at only a few privately known locations in the District) are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts to the resource.

9.3 POLICY: Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law.

10. HABITATS (6 AAC 80.130)

10.1 POLICY: To maintain anadromous and resident fish populations and associated wildlife, land and water uses potentially affecting anadromous fish streams will be designed to conserve or improve existing habitat or mitigate adverse impacts. To prevent unnecessary encroachment upon these stream channels, their banks, and associated floodplains, new construction and land clearing shall, where feasible and prudent, be buffered by a natural vegetation zone within a minimum of 25 feet along either side of the 100-year floodplain. A wider buffer is encouraged where appropriate to provide greater protection.

10.2 POLICY: Areas already industrialized, such as Sitka Channel, Sawmill Cove, and Jamestown Bay, shall be given priority for siting future water-dependent commercial and industrial development, since industrialized areas generally have low fish and wildlife resource and habitat values and will be less adversely impacted by development than would non-industrialized areas.

10.3 POLICY: Land and water uses having the potential to significantly adversely impact habitat seasonally supporting substantial concentrations of herring eggs, shall, to the extent feasible and prudent, be designed to conserve existing habitat or mitigate significant adverse impacts.

Appendix G—Response to Comments

STUD PUBLIC USE MGMT PLAN 1993

ENFORCEABLE POLICIES

The following policies were developed and revised by members of the Coastal Management Citizens Committee. These policies apply only to those locations within the Sitka Coastal District specifically listed as "Special Management Areas" within the Public Use Management Plan. These policies supplement, and do not replace, the policies on the 1989 Revised Sitka Coastal Management Program.

1. Tideland uses shall be compatible with the recreation nature of the upland use at public cabin and trailhead Special Management Areas.
2. Where feasible and prudent, a minimum "no development" buffer of 100 feet shall be maintained on each side of the bank of each sockeye stream as well as the entire lake to 200 feet from the lakeshore landward, in order to protect the sockeye resource. If a stream-by-stream review is conducted by the Alaska Department of Fish and Game, the buffer, which also establishes the boundary of the Special Management Area, may be adjusted to protect and perpetuate both the passage and spawning areas on these sockeye streams, through an Alaska Coastal Management Program amendment process.
3. U.S. Forest Service public use cabins shall be managed for recreation and conflicting uses not permitted, within a Special Management Area boundary of 200 feet around the cabin. Where located on a lake, this boundary shall include the entire lake and a 200 foot buffer strip around the lakeshore.
4. Floating facilities shall be prohibited within the boundaries of Special Management Areas except for the maintenance of the recreation and/or subsistence resources within the Special Management Areas. Exceptions to this policy may be made only after a consistency review or other public process determines that there is greater public benefit by permitting a use (e.g., temporary moorage of a fish buying scow) in a Special Management Area than the public benefit accrued by protecting that Special Management Area exclusively for recreation and/or subsistence uses. Existing leases and special use permits within the Special Management Areas are exempted from these policies. If the lease or permit is renewed or the project is modified, it would then become subject to the policies in this Plan.
5. Where feasible and prudent, a "buffer strip" of 100 feet shall be maintained on each side of all trails listed as Special Management Areas, for the protection of the trail and the recreational experience. If it would be necessary to cause a significant adverse impact to the trail, the trail should be relocated where the buffer can be maintained. Where feasible and prudent, all viewpoints, scenic areas, and other unique recreational features of the trail shall be protected.

18

15/17

6. Where feasible and prudent, all land- and water-based uses which conflict with the management of the Special Management Areas shall be prohibited. These uses include, but are not limited to, structures (temporary or permanent) except for public use facilities; beach or water storage of logs or equipment; mariculture/aquaculture facilities of any type, including temporary uses such as herring pounds; and all floating facilities, other than for short term, temporary use as described under Policy 4. This policy does not preclude the development of fish enhancement projects when a need is shown and proper evaluation, including a formal public process, has been completed. Existing leases and special use permits within the Special Management Areas are exempted from these policies. If the lease or permit is renewed or the project is modified, it would then become subject to the policies in this plan.

7. New transportation facilities are exempted from all other enforceable policies contained in this Chapter, but must meet the criteria described below. Existing transportation facilities are exempted from all enforceable policies and are not restricted as to repair or modifications. Transportation facilities include, but are not limited to, log transfer facilities (LTF), log storage areas associated with LTF's, and road construction within or across a Special Management Area. This policy does not preclude management of the Tongass National Forest by restricting facilities that are required to manage the uplands in a manner consistent with the land use designation for the area.

Criteria to be used in the consideration of siting of new transportation facilities are:

- a. Where feasible and prudent, transportation facilities shall be located outside Special Management Areas.
- b. If it is necessary to locate a transportation facility within a Special Management Area, the immediate vicinity of identified Special Management Area recreation sites (such as cabins, popular camping or picnic areas, and streams commonly used for recreational and subsistence fishing) shall be avoided.
- c. Log storage sites associated with the LTFs will be kept to the minimum size needed to serve the LTF. Logs will be removed to alternate sites outside the Special Management Area as soon as practical.
- d. Facilities within a Special Management Area shall be kept to the minimum area necessary to provide for safe operation of the facility.
- e. A need must be shown and proper evaluation, including a formal public process, must be completed.

19

16/17

143

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME
DIVISION OF WILDLIFE CONSERVATION

FRANK H. MURKOWSKI,
GOVERNOR

P.O. BOX 25526
JUNEAU, AK 99802-5526
PHONE: (907) 465-4100
FAX: (907) 465-2332

MEMORANDUM

TO: Sandy Harbanuk
Project Review Coordinator DGC

FROM: Tom Paul
Program Coordinator – ADFG/DWC

DATE: December 16, 2002

SUBJECT: Shoreline Outfitter/Guide DEIS (Guided Recreation)

The Alaska Dept. of Fish and Game (ADFG) has reviewed the Shoreline Outfitter/Guide Draft Environmental Impact Statement (DEIS) for commercial outfitting and guiding activities on the shoreline of the Tongass National Forest (TNF) in northern Southeast Alaska. The following are consolidated comments from the divisions of Habitat and Restoration, Sport Fish, and Wildlife Conservation. The Division of Wildlife Conservation (DWC) was an active member of the Unit 4 Brown Bear Management Team (BBMT), a stakeholder agency and citizens' advisory team which contributed a significant number of scoping comments to this National Environmental Policy Act (NEPA) process. In addition to these comments the DWC includes by reference any additional comments submitted to the Forest Service (FS) by the BBMT.

The analysis area for this project includes approximately 7,018,700 acres of the Admiralty Island National Monument, and the Hoonah, Sitka, and Juneau Ranger Districts. The shoreline zone of the analysis area extends one-half mile inland from mean high tide, and includes approximately 5300 miles of shoreline. Eleven communities are within the analysis area: Juneau, Sitka, Port Alexander, Tenakee Springs, Pelican, Elfin Cove, Gustavus, Angoon, Hoonah, Haines and Skagway. Two areas on Admiralty Island are excluded in the DEIS: Mitchell Bay and environs, the Pack Creek Zoological Area. The national forest shorelines associated with the Juneau and Sitka road systems are also not included.

The project is intended to determine the amount of carrying capacity allocated to commercial use, specify the types of commercial recreation activities permitted, specify methods of access approved for commercial use, specify the types and locations of areas where large groups can occur and under what conditions, specify mitigation measure for commercial recreation activities, and establish monitoring requirements. Five alternatives are analyzed in the DEIS,

Shoreline O/G DEIS
2.9-0051
12/16/02

1/7

ADF&G comments 2 12/10/02

Shoreline Outfitter/Guide DEIS

with Alternative 1 the no action alternative, Alternative 2 the proposed action, and Alternative 5 the preferred alternative.

General comments

The Shoreline Outfitter/Guide EIS is a much needed and welcome document that will direct FS management of commercial outfitter/guides for the foreseeable future. Because of its importance a high quality document is essential. In general this DEIS has good descriptions of the resources and characteristics of the Use Areas including maps with good detail and descriptions. We find, however, that the positive aspects of the document are outweighed by major flaws related to its scope, the scale of analysis, vagueness on coordination with state planning, little opportunity for public involvement in the carrying capacity analysis driving the DEIS allocations, the lack of explanation or rationale for some important assumptions and decisions, and the weakness of proposed mitigation and monitoring actions.

One particular disappointment is that the DEIS does not meaningfully address the major recommendations of the Unit 4 Brown Bear Management Team. The team had representatives of a broad cross-section of interest groups including brown bear guides, wilderness-recreation and conventional tourism industries, environmentalists, resident hunters, small communities, Native corporations, non-hunting recreationists, and subsistence users, as well as ADF&G, the Alaska Board of Game, and the FS. The diversity of this stakeholder group and its ability to come to consensus on many brown management issues is particularly noteworthy and valuable. The FS strongly supported the team throughout its tenure and its failure to use the opportunity of this EIS to seriously consider and implement the team's recommendations, particularly those dealing with the limits on guided brown bear hunts and guides and on designation of human bear high use zones, is a surprise and a major disappointment.

Geographical Scale of Analysis

The project area is subdivided into thirty-eight different Use Areas based on already existing ADF&G hunting guide use areas. Thirty-seven of these contain a shoreline zone and are included in this analysis. The correspondence between the DEIS Use Areas and ADF&G guide use areas is appropriate in general. It would be more appropriate if the DEIS had allocated use to types of guide/outfitters including hunting guides, instead of lumping all commercial use together in one allocation (see Scope section below).

In some circumstances however, the DEIS Use Areas are too large and not specific enough. The Forest Service has stated in the "Shoreline Recreation Carrying Capacity" analysis document (SRCC) 2001 that "Much of the land in the analysis area is functionally unsuitable for onshore recreation because of impenetrable vegetation, steep or water saturated terrain, or the cost of reaching remote areas. The majority of the coastline is rugged and rocky, so easy access by boat is limited primarily to protected bays and beaches. Many of these recreation places were inventoried in the Forest Plan. We assessed where boats could come ashore and where groups could reasonably recreate, given the local topography within each Use area".

The BBMT noted this problem in its scoping comments, recommending that "Areas meriting special attention" within the use areas be identified and managed on a smaller scale. In the DEIS the FS does not appear to have explained its apparent assumptions that 1) users will spread out

2/7

Appendix G—Response to Comments

ADF&G comments 4 12/10/02
Shoreline Outfitter/Guide DEIS

also extend the moratoria until the other process has made the “permanent” allocations. The Alaska Board of Game also urged that the FS describe its process and continue the moratoria in a resolution passed unanimously at its Nov. 7, 2002 meeting (see attachment).

Assessment of the effects of DEIS alternatives on sport fisheries is also hampered because use areas identified in the DEIS encompass multiple watersheds and fisheries. Bays, beaches and streams will be managed in the aggregate without consideration for the proportion of permitted use or type of use that they will attract individually. Some popular streams that currently receive a relatively high level of guided effort have been assigned independent mitigation in the DEIS. However this strategy does not seem to have been applied to all management areas that contain a number of sport fishing streams. As is, the DEIS does not effectively manage use from a fisheries standpoint.

Because allocation between types of commercial activity was not addressed and multiple streams are treated in the aggregate, it is difficult to identify where and to what degree future restrictions in the sport fishery may be needed. Independent of the distribution of use and type of use, or the proposed action decided upon in this DEIS, the Alaska Department of Fish and Game will manage fish stocks for sustained yield by restricting harvest limits or methods and means when and where necessary. Where sport fishing effort under existing regulations puts stocks at risk, harvest limits and/or methods and means will be restricted by emergency order. Similarly, it is difficult to determine the effect this will have on the diversity of sport fishing opportunity in SE Alaska.

Coordination with state planning

The DEIS lacks detail as to how the FS has assured its shoreline carrying capacity allocations are compatible with the state's parallel planning process for state lands in the same area, the Northern Southeast Area Plan (NSAP). The Habitat and Restoration Division was actively involved with the NSAP. This document was created by the Alaska Department of Natural Resources and has gone through draft and final review processes. The final document will be available in summer 2003. The NSAP determined management intent, land-use designations, and management guidelines that apply to all state lands in the planning area. This includes submerged lands, tidelands, uplands and shorelands managed by the state. Tidelands span the areas from mean high water to mean lower low water, submerged lands reach from mean lower low water to a line three miles seaward from mean lower low water. Shorelands include the lands below ordinary high water in non-tidal areas. Tidelands are the major source of access into the NF for most guided operations.

Considerable effort has been expended in the plan preparation process of the NSAP. The FS was closely involved in the planning process along with local governments, conservation groups and native governments. Tidelands polygons and Tideland Management Resource Zones (TMRZ) were developed through this plan. Land-use designations have been applied to the tideland polygons and TMRZ. A land-use designation recognizes uses or resources that are of major importance in a particular management unit. Unit designations are based on current and projected future use patterns and the most significant resources identified in each unit.

ADF&G comments 3 12/10/02
Shoreline Outfitter/Guide DEIS

naturally throughout the Use Areas, 2) that these users will apparently be satisfied to spread out to avoid other users, and 3) that all areas in a [Use Area] will support the same quality of experience. In addition, the monitoring plan does not appear to include the testing of planning assumptions and the opportunity to make year-to-year adjustments in the FS shoreline use allocations resulting from this EIS.

The Final EIS needs to identify Use Areas where activity will likely concentrate at focal points such as inventoried recreational places (protected bays and beaches) and clearly explain how proposed use levels will affect these smaller areas. It should also include a plan for monitoring the effects of the EIS use allocations and a mechanism for changing the allocations if necessary.

Scope of DEIS

The scope of the DEIS too limited. The DEIS allocates use between commercial and non-commercial sectors but stops short of allocating use among the various types of commercial activities. This limitation inhibits an assessment of the effects of individual types of commercial and non-commercial activity (such as sport fishing, bear hunting, etc.) on an area's resources and users. The level of compatibility of uses also cannot be addressed, nor can an assessment be made of what effect allocations to one use have on other uses.

The alternatives provide a broad range of options, all of which allow for growth in commercial activities. However, the level of use for specific type of permitted commercial activity was not addressed. Although all alternatives allow for growth, it remains unknown what types of commercial activities will be permitted in areas and how that allocation will be determined. Since this aspect was not addressed in the analysis, possibilities include growth in all types of commercial activities, growth in some but not others, or growth in some but reductions in others. The DEIS gives no guidance to District Rangers or other managers for allocating between types of use when it comes time to issue specific permits. Furthermore, it appears that the DEIS did not recognize that growth in commercial guiding for brown bears may be unwise and is NOT supported by a broad group of stakeholders, including big game guides, wildlife watchers, conservation groups, etc. (i.e. the Unit 4 BBMT). If it is the intent of the FS to suggest growth in this commercial sector, the FS needs to present additional information to justify that.

Deferring allocation between types of use to some future undefined process is extremely disappointing to the department which was led to believe that this EIS process would be the one to make specific allocations to guided bear hunting if not other types of guiding. For a number of years it has been clear that FS limits on the number of guided bear hunts it permits would be the most effective way to help meet ADF&G brown bear harvest guidelines in Units 1 and 4 while ensuring a viable brown bear hunting guide industry in the area. Although acknowledging that, the FS has said it could not limit the number of guided bear hunts it permits without a public NEPA process to determine appropriate levels. Until recently, the Shoreline Outfitter/Guide EIS process was designed to be the mechanism for setting those levels. Indeed, temporary moratoria on increasing brown bear hunting guide permits and hunt numbers issued in Units 1 and 4 were to be ended upon completion of this EIS process. These moratoria are set to expire with the completion of this EIS process (DEIS, Chapter 3, pg. 113). If the FS is determined not to include allocation levels for guided bear hunts in the EIS, then we ask the FS to specifically describe in the FEIS, or in an attached appendix, the kind of process to be used to make those allocations, the timeline for that process, and what plans it has for public and agency involvement. It should

Response to Comments—Appendix G

ADF&G comments Shoreline Outfitter/Guide DEIS	6	12/10/02
We ask that the FEIS clearly explain the rationale behind the proposed prohibitions and restrictions.		
Restrictions on fishing in use areas, such as 04-01A, 04-02A, and 04-03 under alternatives 2, 3, 4, and 5, appear to be taken to mitigate some impact to the resource. In most or all cases, these measures are not necessary for the conservation of fish populations. We agree with the statement: "current and future fishing effort by guided freshwater sport fishing represents a minimal fraction of total harvest in the analysis area and surrounding salt waters". For that reason, and through the authorities of the Board of Fisheries and the Federal Subsistence Board, conservation of fish populations will be maintained regardless of restrictions to guided sport fishing imposed through this effort.		
<u>Mitigation</u> We are pleased the mitigation section of the DEIS includes many recommendations and guidelines from the Unit 4 BBMT. However, in some cases it is not clear how the mitigation measures will be implemented. For instance, the BBMT concept of "Human/bear high use zones" is included in the DEIS, but no practical steps necessary to implement the concept are included. Key to implementing the tiered mitigation measures in high use zones is the need for inventorying areas likely to qualify, evaluating whether the areas merit designation, and monitoring activity in the areas over time in order to determine when mitigation measures are required. The DEIS proposes no link between this mitigation and monitoring and indeed the DEIS monitoring section has not proposed the monitoring necessary to effectively implement the high use zone mitigation measures.		
In addition, although the DEIS on page 11, Appendix C seems to accept the BBMT recommendation that Lake Eva estuary, Mud Bay, and Trail River (Idaho Inlet) estuaries are Tier I high use zones in which airplane, ATV, jet boat, and helicopter access should be prohibited, only the Appendix A Use Area Cards for Lake Eva includes this prohibition as mitigation and only airplane access is mentioned. Airplane access to Mud Bay is permitted, contradicting the statement in Appendix C and the recommendation of the BBMT. Motorized watercraft restrictions at Mud Bay and Trail River are only to be imposed if adverse effects to fish habitat are determined. Unacceptable disturbance to bears and other wildlife should also be grounds for restrictions in our view. Other Tier I restrictions on camping near salmon streams, campfires, barbecues, etc. are not mentioned on the use area cards.		
These contradictions and deficiencies should be remedied and a formal commitment to evaluation and monitoring of human/bear high use zones should be included in the FEIS. Without such concrete measures we are afraid this portion of the mitigation plan will be mere window dressing and ineffective.		
<u>Monitoring</u> Proposed monitoring is inadequate to evaluate the effectiveness of this action. The stated objective of project monitoring (Appendix D, p. 3) is to: "provide a quality recreation experience..." To do so requires quantitative analysis of preferences among all users – commercial and non-commercial – affected by this analysis. Efforts currently identified in the monitoring plan include anecdotal, subjective and non-scientific tasks, many involving public		

ADF&G comments Shoreline Outfitter/Guide DEIS	5	12/10/02
A significant portion of the tideland polygons and all of the TMRZ are designated habitat. This designation applies to areas of varied size for fish and wildlife species during a sensitive life-history stage where alteration of the habitat or human disturbance could result in a permanent loss of a population or sustained yield of a species. Timing restrictions for these tidelands polygons and TMRZ areas should be incorporated into the Use Areas of the Shoreline Outfitter/Guide DEIS so the resources found there can be protected i.e. waterfowl/shorebird concentration areas, herring spawning areas, sea lion/harbor seal haul-outs, etc.		
The DEIS does not make note of the habitat designation on state lands and so raises the question of whether or not the proposed use allocations take this designation into account. No timing restrictions for commercial use are proposed in the DEIS for any areas. The FS is familiar with the NSAP and the FEIS should acknowledge the state designations on lands adjacent to FS lands and incorporate NSAP site-specific information and timing restrictions where appropriate to make the EIS and NSAP as compatible as is feasible. NEPA requires the FS to consider cumulative actions, which when viewed with the proposed action have cumulatively significant impacts on the human environment (see 40 C.F.R. 1508.25 (a)(2)).		
<u>Recreation Carrying Capacity Analysis</u> The "Shoreline Recreation Carrying Capacity" analysis (SRCC) done by the FS in 2001 preparatory to producing the DEIS had too little public involvement in our view. The results of the SRCC appear to drive all the allocations in DEIS and yet, because the carrying capacities of areas were unilaterally determined by the FS in a separate document, the public and other agencies are not able to analyze or critique those carrying capacities. Furthermore the method for determining social carrying capacity as described in the DEIS Appendix F is based on a one-size-fits-all formula matching TLMP ROS class encounter levels to all Use Areas of the analysis area with no regard for the individual characteristics of the Use Areas. More appropriate in our view is a method employing user surveys to determine the carrying capacities by gauging the public's "limits of acceptable change" for each area. Such surveys should be used in a formal monitoring program used in field verifying the appropriateness of EIS allocations (see Monitoring section below).		
Rationale for prohibitions and restrictions on guided sport fishing Prohibitions and restrictions on guided sport fishing specifically proposed under alternatives appear arbitrary and are unnecessary for conservation reasons. The analysis explicitly refrained from allocating use between types of commercial activity but then specifically restricted guided sport fishing use in a number of areas as mitigation measures under specific alternatives, i.e. 04-03, alternatives 2, 3 and 5. Although these restrictions are posed specifically for one type of commercial activity (sport fishing) use type, criteria used to decide where and why were not identified or discussed in the analysis. The analysis implies that past fishery restrictions and the presence of subsistence fishing activity may have been factors in the decision but fails to identify whether other factors such as user preferences and current stock status were included in the decision. Additionally, how these factors were used in the analysis is absent. Without these parameters explicitly discussed, it appears the measures were arbitrarily imposed on guided sport fishing use. Consequences of the appropriateness of these measures, with respect to guided and non-guided sport fishing and other commercial uses, cannot be assessed without these criteria.		

Appendix G—Response to Comments

12/10/02

7

ADF&G comments
Shoreline Outfitter/Guide DEIS

comments. Scientifically defensible tasks, such as user preference surveys designed to collect statistically valid comments, should be included.

The Fish, Wildlife, and Subsistence Resources monitoring section (Appendix D, p. 5) is inadequate. Although the objective mentions non-consumptive uses, only consumptive use is addressed in the method and action. Two of the actions mentioned are adjusting seasons and bag limits which are not under the authority of the Forest Service. Monitoring of fish and wildlife needs to include more than simply reviewing harvest and use records. Areas need to be visited periodically, and systematically and use monitored to determine not only harvest affects but to evaluate disturbance effects on wildlife and habitat.

An example for such an evaluation and monitoring program already exists. In summer 2002, ADF&G and the Forest Service cooperated on a summer-long field evaluation of brown bear and human activity at Lake Eva estuary. The report and recommendations from that study are due in early 2003. Preliminary indications are that Lake Eva may not be as desirable a location for enclave designation as earlier believed. Although we are not recommending a change in Lake Eva's status at this stage, the point is that most areas have had little formal field evaluation of their suitability for various levels or types of commercial use. A commitment to formal evaluation of all sites over time should be a part of the monitoring plan of this EIS. Also, a method (preferably including public and agency involvement) needs to be identified for changing the allocations for areas should the monitoring program indicate that need.

Specific Comments
Chapter 3 Environment and Effects -

Page 85 reference to Katzebin River contains productive run of chum salmon. This system also provides important spawning and rearing habitat for coho salmon and Dolly Varden.

Page 122 states "No restrictions on the main stems of large glacial streams within the analysis area would be necessary because salmon are unlikely to spawn there." This assumption is false. Salmon do spawn in the main stems of glacial rivers. For instance, the main stem of the Chilkat River supports a very large spawning population of chum salmon. In addition, large glacial streams often provide valuable rearing habitat for chinook and coho salmon. Guided activities on large glacial streams need to be monitored to document negative impacts to spawning and rearing habitat.

Thanks for the opportunity to comment.

7/7



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

December 16, 2002

133

Mr. Fred S. Salinas
Deputy Forest Supervisor
Tongass National Forest
Alaska Region
204 Sigiraka Way
Sitka, Alaska 99835

ATTN: Ms. Mary Beth Nelson

RE: Tongass National Forest (USFS) Shoreline Outfitter/Guide
Draft Environmental Impact Statement (DEIS) Comments

Dear Mr. Salinas:

Thank you for the opportunity to provide comments for the referenced project. The National Marine Fisheries Service (NMFS) focused our review of the DEIS on the Essential Fish Habitat (EFH) assessment and impacts to marine mammals. Our comments are given below.

Essential Fish Habitat:

The DEIS concludes that the project may adversely affect EFH by both individual and cumulative effects from outfitter/guide activities in the riparian zone and indicates that the level of adverse effects would need to be determined through site evaluation and monitoring. Mitigation of the effects if proposed through compliance with Best Management Practices (BMPs) and mitigation measures outlined in the document. The EFH assessment further asserts that application of Best Management Practices (BMPs) will eliminate adverse effects to EFH.

The USFS has taken an approach to EFH in the DEIS that blends both a proactive preventative and reactive corrective approaches to the adverse effects of EFH. Proactive approaches include the camping restriction from 100 feet from bodies of water, and the requirement that outfitter/guides and their clients travel only between high and low water marks of streams, when practical. A reactive, corrective approach includes the list of possible restrictions of motorized water craft use in streams. The restrictions would be implemented

Shoreline OIG EIS
29-0053
12/16/02



1/4

ALASKA REGION - www.fish.noaa.gov

Response to Comments—Appendix G

only if the adverse effects of water craft become measurable by visual observation of stream bank erosion during permit administration, on a site-specific basis.

NMFS believes that the reactive, corrective approach for motorized water craft use associated with outfitter/guide permits should be replaced with the proactive, preventative approach. This would prevent damage to EFH before it occurs, allow for consistent implementation of measures among users, and define rules for use of sensitive habitats up front to outfitter guides.

The use of visual impacts to the stream bank (i.e. stream bank erosion) proposed as a diagnostic reactive measure of water craft damage to habitat would not prevent damage to stream banks. Further, NMFS does not believe this approach would be sufficient, even as a reactive approach, to protect fish spawning gravels and eggs from impacts due to the turbulence created by the power heli of motorized water craft. This is because the impacts are in another area of the stream than the proposed diagnostic and may never be detected.

According to the DEIS, motorized water craft are known to cause severe mortality to fish eggs and juveniles in certain situations. The proposed restrictions to motorized water craft directly address these situations in a preventative manner.

The proposed restrictions are:

- 1) Permit motorized water craft use only in May and June (the period between emergence and spawning);
- 2) restrict boat size and power;
- 3) limit use to water depths of three feet or more;
- 4) limit speeds to no wake;
- 5) exclude motorized use on specific sensitive portions of streams

NMFS recommends, as our first **ECH Conservation Recommendation**, that these suggested restrictions for motorized water craft be further developed and required for all anadromous fish streams with known spawning activity.

Establishment of large group area and 15% areas to direct large tours is included in the DEIS. Although the USFS does not have jurisdiction for tidelands, subtle habitats or waters, indirect effects of establishing the large group and 15% areas may affect resources under NMFS jurisdiction, including EFH. Areas of concern would include sensitive habitats including estuaries areas, mudflats, areas with submerged aquatic vegetation (eelgrass or surfgrass), or nearshore kelp beds. Heavy use of these areas for embarking and disembarking visitors may increase environmental degradation by repeated anchoring, trampling or accidental oil/chemical spills. NMFS recommends, as our second **EFH Conservation Recommendation**, that establishment of each large group and 15% area should include an analysis of the sensitivity of the area to these potential impacts, and any areas that could cause adverse impacts to the sensitive areas listed above should be removed from consideration.

Please note that under section 305(b) (4) of the MSFCMA, the USFS is required to respond in writing within 30 days to NMFS EFH Conservation Recommendations. If the USFS does not make a decision within 30 days of receiving EFH Conservation Recommendations, the USFS should provide NMFS with a letter to that effect, and indicate when a full response will be provided.

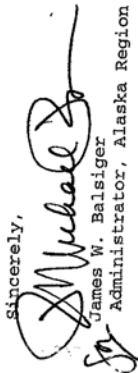
Impacts to Marine Mammals:

The "Marine Mammals" section of Appendix C, Mitigation Measures, needs to be updated to include reference to regulations that protect humpback whales from approach by vessels. These regulations became effective July 2, 2001. An insert to the NMFS Marine Mammal Viewing Guidelines that summarizes the regulations is enclosed. Please include this updated information in the Final EIS and future USFS environmental documents.

Appendix G—Response to Comments

Please direct any questions you may have regarding these comments to Linda Shaw at (907) 586-7510.

Sincerely,


James M. Balsiger
Administrator, Alaska Region

cc: Mark Jen, EPA, Anchorage
ADEC, AADGC, ADN, ADF&G, USFWS, Juneau



December 18, 2002

Shoreline Draft EIS comments
ATTN: Bill Tremblay
USDA Forest Service
Tongass National Forest
204 Sigana Way
Sitka, AK 99835

Re: Comments to the Shoreline Outfitter/Guide Draft Environmental Impact Statement

Dear Mr. Tremblay,

I would like to begin by thanking the Forest Service for consulting with the Sitka Tribal Council on the Shoreline EIS. Sitka District Ranger Carol Goularte is to be commended for providing the Tribal Council with the utmost opportunity to comment on this Forest Service action. Additionally, it is clear that Forest Service staff has put much hard work into this process. I can see that you all have thought hard about current and possible future uses of this area.

Sitka Tribe of Alaska's Chosen Alternative

After our second consultation meeting with the Forest Service on the Draft Shoreline EIS, the Tribal Council voted to support alternative four, with the addition of more enclave areas (outlined below). Thus, the Tribal Council supports allowing only 8% of the carrying capacity to be devoted to commercial outfitters and guides, while allowing the larger groups to utilize more locations, so as not to disperse the effect these users have on the Forest. The Tribal Council supported alternative four because we felt that it gives ample room for growth of the cruise ship industry in the Sitka area, especially for the next ten years, while ensuring that subsistence activities are not restricted along the shoreline of the Tongass National Forest.

Additional Enclave Areas to add to Alternative Four

The Sitka Tribe of Alaska supports enclave or 15 percent areas in the following locations within the Sheet'ka Kvaaan (the traditional territory of the Sitka Tribe): Eagle River Road, Point Elizabeth, Nismem Point, Sitkoh Bay Road, Patterson Bay, Rodman Bay, and Nelson Falls. It is important for tourists to experience the Tongass first hand, as a visit to the forest will only encourage more responsible stewardship of these lands. The Sitka Tribal Council supports these enclave areas, as the Council does not know of any cultural resource or subsistence concerns at these areas at this time.

4/4

Shoreline OIG EIS
2.9-0057
12/18/02

456 Katlian Street • Sitka, Alaska 99835 • (907) 747-3207 • Fax (907) 747-4915

1/6

Response to Comments—Appendix G

- However, the Sitka Tribe strongly opposes large groups visiting the following potential enclave areas within the Sheet'ka Kwaan:
- **Lake Eyr:** This area is a pleasant place to visit and is used heavily by local residents for recreation and subsistence. Allowing cruise ships to visit the area daily throughout the summer does not allow for residents to experience the area in a peaceful setting.
 - **Saook Bay:** The area has high value to local residents for subsistence. A rich variety of wildlife exists in this bay and it holds high value as a place of serene beauty.
 - **Poison Cove:** There is a Native Allotment in Poison Cove and this area also receives high use by locals for subsistence purposes. Many local residents commented this summer that they feel as if Poison Cove should be designated a Wilderness area because of its value as an undeveloped area. There are also cultural resource concerns in the area.
 - **Todd Road/Lindenburg Head:** This area has cultural resources that Sitka Tribe of Alaska would like to see protected.
 - **Hanus Bay:** Hanus Bay is beautiful and has high value as a place to kayak, hike, and view wildlife.

Industry Growth

I am glad that your team used the example of Sitka for demonstration of the potential for industry growth in area 04-03. It was disturbing to the Tribal Council that up to eleven cruise ships could access the Forest per day under alternative five. One would be hard pressed to find more than eleven good anchoring spots in area 04-03! We do not want to feel so crowded that we cannot go anywhere in Sitka Sound without encountering tourists.

For this reason, the Tribal Council chose to back Alternative four. A maximum of three groups per day seems reasonable enough, considering the number of recreational users who live in Sitka.

If the industry is using three percent of the Forest annually as of 1999, alternative four gives ample room for the industry to more than double its use of the Forest. If the industry is growing at (an average of) eight percent per year, it would take until 2010 to reach eight percent, which is the limit for growth under alternative four. That would be a good time to re-evaluate the Outfitter/Guide permitting program.

2/6

Subsistence Concerns

Sitka Tribe of Alaska has many concerns about the potential impact of the Shoreline project on subsistence activities within the Sheet'ka Kwaan. First, I do not think the Forest Service analyzed the appropriate range of effects the plan may have on subsistence activities. The Forest Service failed to address any indirect impacts this plan may have on subsistence. As noted at our latest consultation meeting, many subsistence users of marine subsistence resources utilize nearby anchorages for overnight camping, or short respites between activities or locations. However, in the Forest Service's analysis of effect on subsistence, the Forest Service only considered effects on subsistence resources actually located within the areas of mean high tide to half a mile inland of the shoreline. This type of analysis is missing half of the affected uses.

Second, in order to ensure that this land use planning decision does not "significantly restrict subsistence use,"¹ the Forest Service should conduct studies regarding the subsistence use of the shoreline of the Tongass. The purpose of Title VIII of ANILCA was to protect subsistence uses on public lands by requiring that other uses of public lands have the least adverse impact possible on subsistence.² It seems that little concrete information is known about where subsistence activities take place. Many hunters and gatherers go to certain spots - they are not spread across the entire analysis area.

Third, subsistence uses of the Tongass National Forest are not even analyzed by the Forest Service; data received is from the State Department of Fish and Game. Thus, how is it that the Forest Service is ensuring that subsistence uses of the Tongass are being protected? The Sitka Tribe supports Alternative Four, because it seems that 8% use of the recreational carrying capacity reflects the Forest Service's directive from Congress to ensure that other land uses have the least adverse impact possible on subsistence. For this same reason, the Sitka Tribe believes it is essential that the Forest Service commence its own data collection project to document subsistence uses of the shoreline of the Tongass, perhaps in conjunction with the Sitka Tribe.

Additional Comments regarding the Shoreline Draft EIS

Monitoring of Guides and Outfitters

One point that was brought up at the second consultation meeting that concerns the Tribal Council is the lack of a real monitoring program. If the Forest Service is going to increase allocations for permits and issue new ones, there is a great deal of potential for abuse. Additionally, the Forest Service should be more concerned about un-permitted guided groups. A self-monitoring system set up for all guides to watch each other is a good idea and can be effective, but this should be encouraged through the permitting process.

2/6

¹ Alaska National Interest Lands Conservation Act (ANILCA), 16 U.S.C. §3120(a).
² ANILCA, 16 U.S.C. §312.

Appendix G—Response to Comments

As mentioned during the meeting on Tuesday night, our Tribal Council is also concerned about cruise ship pollution and other effects left by these large ships. We hope that you will keep an ear to the industry and discontinue to permit polluters.

Sitka Tribe of Alaska would gladly assist the Forest Service with monitoring of cruise ships. We are currently managing three field projects and cover a great deal of water during the spring, summer, and fall months with trips to and from the weirs. Additionally, our Traditional Foods program takes us into the Tongass most of the year in order to provide for elders and others. Monitoring could easily fit into our already-existing field programs and this would also give an indication as to whether or not the guides are interfering with subsistence users.

Socio-Economics

It is unfortunate that little data has been collected before the publication of this report. What little data that is available tells us that

[A] significant proportion of the region's economic base is tied not to the local production of goods and services but to the choice of individuals to continue to live in the small communities... (Draft EIS, 3-63)

[T]he breadth and quality of recreation opportunities for local residents may be as important in generating incomes in the analysis area as are tourism and recreation operations catering to visitors. This needs to be considered when balancing commercial and non-commercial recreation access on the national forest. (Draft EIS, 3-63)

The Sitka Tribe is concerned that only 27 of 45 outfitter and guide permit holders from the Sitka Ranger District actually have an address in Sitka. This concerns the Sitka Tribe, because one of the stated ideals of this project is to provide non-timber based economic opportunity within the Tongass. The Sitka Tribe questions why the Forest Service would want to expand a project when the beneficiaries of economic opportunities are non-local, and the local economy is hurting so much. If the Forest Service is concerned with providing non-timber based economic opportunities, why don't you ask the local citizens what type of opportunities they would like to see on the Tongass?

Small Groups

At the second consultation meeting, Carol Goularte mentioned that more monitoring of small groups is needed. The Sitka Tribal Council concurs with this statement. Little is known about guided groups and little is known of how much locals use the forest. A survey of all of the users of the first half-mile of uplands on the Tongass would probably show that local use far exceeds non-local use. This would help the Forest Service with more location-specific allocation issues.

Carrying Capacity Versus Desirable Use Levels

The Forest Plan is a huge document and some of the resulting percentages are vague and difficult to understand. For example, allocating 50% of the forest to outfitters and guides

4/6

appears to be a number from thin air. Making allocative decisions about forest use should not be done with percentages but with real data. LUDs were given based on public input. However, few real geographical surveys have been done to determine which areas hold high value to tourists versus which areas are important for subsistence and locals' recreation.

A Tribal Subsistence Database

Sitka Tribe has a close relationship with Tribal Citizens. A major goal of our staff for the past few years has been to compile databases based on interviews with Tribal Citizens. The result is a GIS layer that shows high use areas. The data was compiled with the confidence that it would not be shared with anyone. However, staff can use the databases for planning purposes and much of the data given in this letter is a result of review of the GIS database.

The GIS database has become an important tool for us as we look at each Forest Service EIS that comes to our office for review. We recommend that the Forest Service consider doing a similar survey of local residents in order to assist planning. Our staff would certainly be willing to assist in developing methodology for the survey.

Allowable Activities

At our latest consultation meeting, in response to question as to whether permitted outfitters and guides ever pick berries, Carol Goularte responded that permittees can only do what is contained in their permit. However, I wonder whether any permits ever allow outfitters and guides to pick berries, and if so, how many permits out of the Sitka Ranger District allow such activities, and how often berry picking is allowed?

Thank you very much for listening to the concerns of Sitka Tribe of Alaska. If you have any questions or concerns, please do not hesitate to contact Jessica Brown at the Sitka Tribal offices, at 747-3207.

Best regards,


Lawrence Widmark
Chairman, Sitka Tribe of Alaska

5/6

City of Tenakee Springs RESOLUTION 2003-15

In the Council
December 19, 2002

Introduced by the
Council President

147

A RESOLUTION FOR THE CITY OF TENAKEE SPRINGS, ALASKA SUPPORTING THE CONCEPTS OUTLINED IN THE SHORELINE OUTFITTER/GUIDE DRAFT ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, the City of Tenakee Springs supports the Forest Service's efforts to manage the recreational uses on the National Forest; and

WHEREAS, the USFS Preferred Alternative increases use over current use by over 700%; and

WHEREAS, the City of Tenakee Springs feels this level of increase is unjustified by available demand data; and

WHEREAS, the City of Tenakee Springs finds that the ROS classification for the individual proposed enclaves and 15% use enclaves are not appropriate for actual site conditions in LUD's where they are applied; and

WHEREAS, the City of Tenakee Springs has long been concerned about the impacts of large scale tourism; and

WHEREAS, the draft EIS does not consider the effects of the proposed increase in commercial activities on the City of Tenakee Springs' responsibility to provide medical and search and rescue services; and

WHEREAS, the local community commercial guided activity is in groups of 10 individuals or less which rely on the remote wilderness character for their operation; and

WHEREAS, the economy of Tenakee Springs depends on unguided sport fishers and hunters; and

WHEREAS, those activities would be adversely impacted by a 700% increase in recreational activity in Tenakee Inlet; and

WHEREAS, our community's subsistence and local recreation use would also be adversely affected by this level of permitted activity; and

WHEREAS, the City of Tenakee Springs feels that the DEIS does not adequately address the inevitable effects on the ecosystem caused by large groups and multiple smaller group visits to sensitive areas; and

WHEREAS, the City of Tenakee Springs is concerned about marine safety and the increased risk of oil spills and other damage on the marine environment from the increased use of motorized watercraft in Tenakee Inlet;

Shoreline O/G EIS
2.9-0061
12/19/02

1/2

THEREFORE BE IT RESOLVED that the Common Council of the City of Tenakee Springs hereby supports a level of activity more consistent with Alternative 4 and with further modification of large group enclaves and 15% groups and multiple smaller group areas more consistent with existing recreation activities.

THEREFORE BE IT FURTHER RESOLVED that the Common Council of the City of Tenakee Springs supports an adaptive management approach that provides for responsible commercial recreational development within a framework that supplies the Forest Service with the high quality information it needs to make responsible decisions.

ADOPTED 6 Yes, 1 Absent THIS 19th DAY OF December 2002

Shelly P. Wilson
Shelly P. Wilson
City Council President
ex officio MAYOR

ATTEST:

Mary M. Almy
Mary M. Almy
City Clerk

2/3

Appendix G—Response to Comments

Shoreline Outfitter/Guide Project
ATTENTION: Tom Puchler
USDA Forest Service
Tongass National Forest
204 Signakka Way, AK 99851-7316

12/28/02

RECEIVED

JAN - 7 2003

PETERSBURG OFFICE
TONGASS N.F.

Re: *Shoreline Outfitter/Guide Draft Environmental Impact Statement*

Dear Mr. Puchler:

The purpose of this letter is to provide the Game Management Unit 4 Brown Bear Management Team's (BBMT) comments on the Forest Service's (FS) July 2002 *Shoreline Outfitter/Guide Draft Environmental Impact Statement* (DEIS) and in so doing, to review the 14 recommendations previously made in the team's May 6, 1999 letter to Mr. Fred Salinas of your agency during its scoping process.

The BBMT was convened by the Alaska Board of Game to address a variety of significant issues that relate to brown bear management on the ABC islands (Admiralty, Baranof, and Chichagof). The team comprised a wide variety of private and agency stakeholders, including the following:

- Friends of Admiralty Island, Southeast Alaska Conservation Council
- Sitka Fish & Game Advisory Committee
- Alaska Wilderness and Recreation Tourism Association
- Alaska Visitors Association
- Admiralty Bear Association
- Federal Southeast Subsistence Regional Advisory Council
- Petersburg Fish and Game Advisory Council
- Territorial Sportsmen
- Southeast Alaska Guide Association, Alaska Professional Hunters Association
- Port Alexander Fish and Game Advisory Committee
- Huna Totem Corporation
- Alaska Board of Game
- Alaska Department of Fish and Game
- U. S. Forest Service

The Board of Game chose to install the team in substantial part because it perceived the FS's *Salmon River-Based Outfitter Guide Analysis* as an important element in the overall management of ABC island bears. We were encouraged in this regard by the installation of a FS team member on the BBMT, and by Mr. Fred Salinas' testimony at the 2000 Board of Game meeting in which he reaffirmed the FS's intent to work closely with the BBMT. Consequently, the team has placed considerable emphasis on contributing to the FS NEPA analysis. We provide the present commentary in that spirit.

GENERAL COMMENTS

We had hoped that consensus findings of a broadly-based, expert group such as the BBMT would carry considerable weight with your agency, and that you would see fit to incorporate much of our findings in your analysis. We are disappointed to find this to be generally not the case. Most of the issues we emphasized are either left outside the scope of the DEIS, or are relegated in a rather cursory fashion to either "other environmental considerations" (p. 3-113) or appendices dealing with non-binding guidelines. Few of the team's 14 overall recommendations or the significant issues they addressed have been dealt with adequately in the DEIS. The most critical of these issues are raised in this general section, then further explained in detailed section to follow.

Brown bear hunting. Grave concern over the rapidly increasing number of hunts and hunting guides in Game Management Unit 4 (GMU 4) was at the heart of the rationale for establishment of the BBMT. The FS is uniquely positioned to set limits for these activities, and so the team has placed considerable emphasis on developing appropriate recommendations for the ongoing NEPA process. We were, consequently, very disappointed to find that the FS had decided to delete these considerations from the DEIS.

Shoreline O/G EIS
2-9-0081
12/28/02

1/6

A policy regarding these issues needs to be evolved in a formal public forum and predicated on defensible criteria. We have been informed by Mr. FitzWilliams of your office that the FS intent is to install an administrative process to deal with guide numbers and number of hunts. If that decision stands, the FS has set itself a difficult task to design an effective administrative process that can withstand intense scrutiny and possible litigation. We recommend strongly that the process be spelled out in the FEIS and the Record of Decision, so that there is some measure of NEPA "teeth" afforded to it. See point number 7 below for further discussion of this issue.

Brown bear viewing. Our second major concern with the DEIS is its silence on issues related to brown bear viewing. The BBMT spent a great deal of energy crafting recommendations on this subject, including an innovative alternate approach to the Pack Creek model that might avoid single use management. For the reasons mentioned above, we strongly recommend spelling out any subsequent process in the FEIS.

Use allocation. A third major issue that the BBMT was expecting to see addressed in the DEIS is allocating public use where conflicts between users either have become acute or are rapidly heading in that direction. Instead, the document lumps all forms of recreational use together, giving no guidance to district managers on how to allocate use types. On p.2-47, the DEIS describes the decision to broaden the focus of the analysis as "based on public comment and additional analysis". Certainly this decision runs counter to our input, and we have no knowledge of other portions of the public advising you in this direction. Under the Freedom of Information Act, we request copies of any public input that recommended to the FS that you eliminate bear hunting and guiding issues from specific consideration. See point 6, below, for further discussion.

Human/bear conflict potentials. We were disappointed to see that our concept of "Human/Bear High Use Zones" was given only cursory attention by the FS. We were at some pains to develop criteria for recognizing and managing such areas, typically important salmon streams and estuaries. The DEIS does show some deference to such areas, but mostly as mitigation recommendations relegated to Appendix C. We note particularly that the preferred alternative allows for plane landings in the Mud Bay estuary Human/Bear High Use Zone, which we specifically asked not to happen. See points 8 & 11, below, for further discussion.

Monitoring. In our view, the section on monitoring in the DEIS does not constitute an adequate monitoring plan. There needs to be a more formal and detailed commitment to monitoring the effects of allocation on brown bears and their habitats. A component of this plan should be periodic reevaluation of management actions, with involvement of the public.

Large groups. Finally, a major thrust of the DEIS appears to be the accommodation of large commercial groups of as many as 75 people at a time. Most of the decision alternatives in the DEIS, including the FS's "preferred alternative 5", would authorize large numbers of visitors to go ashore any day of the summer season in areas for which you have indicated no defensible demand data. The DEIS also provides no meaningful data supporting your implied assumption that these numbers are compatible with brown bear behavior and habitat use. See point 5, below, for further discussion.

SPECIFIC COMMENTS

The following comments relate specifically to the 14 recommendations made in our 5/6/99 letter to Mr. Salinas. The numbers correspond with those in our letter, and the letter is appended in order to save us from repeating each of the recommendations in full.

1. **Cooperation with the State.** The DEIS lacks detail as to how the FS has prepared its shoreline carrying capacity determination in cooperation with the State of Alaska to ensure that they are complementary. It is insufficient to make the general statement on page 26, Chapter 1, that "The Forest Service is working closely with the State of Alaska Department of Natural Resources to ensure that the management of the national forest and adjacent state lands and waters are compatible to the maximum

2

2/6

4/6

extent possible." DEIS readers would benefit from knowing state plans (or lack thereof) for tides, etc., adjacent to each large-group area in order to determine what the cumulative environmental, social, and economic effects are. The National Environmental Policy Act (NEPA) requires the FS to consider cumulative actions, which when viewed with the proposed action have cumulatively significant impacts on the human environment (see 40 C.F.R. 1508.25 (a)(2)).

2. Group size. The DEIS does not reflect our recommendations on group size. We had asked for groups to be defined as small, medium and large, but the DEIS persists in retaining a single more vague definition. The DEIS adds, "large group size varies by LUD [Land Use Designation] and ROS." The result is that the DEIS accommodates large groups to a large degree over a large number of areas but does not address their compatibility with smaller groups in a sufficiently detailed way.

3. Explanation of Carrying Capacity Criteria. Page 3-8 refers to the four kinds of carrying capacity criteria – ecological, physical, facility, and social; their use is explained in detail in Appendix F. We generally concur with this theoretical analysis of carrying capacity, and especially are pleased at its separate application to spring, summer and fall seasons. However, we remain somewhat confused as to how these definitions are applied to specific areas. We ask that in the FEIS, this be clarified.

4. Management Area Size and Monitoring. In general, the size of management units seems appropriate. We note especially the provision for subdividing units if found necessary (see point 11). However, the DEIS is unclear on how use will be monitored to detect when established limits are excessive and to determine what corrective action is required. The FS seems to be relying on outfitter/guides' reports and whatever informal or anecdotal comments other forest users happen to submit to the agency. The DEIS discussion (Appendix D) on project-specific monitoring does not appear to describe a sufficiently formalized method of testing the predicted effects once the plan is implemented. An effective monitoring program would include provision for bringing users together periodically to examine the results of monitoring the effects of its shoreline allocation decisions.

5. Areas Managed for Less than Maximum Social or Recreation Carrying Capacity. We are unable to find a provision in the DEIS requiring that carrying capacities will be re-evaluated or adjusted on a regular basis, as we suggested. In addition, compared to present use levels, the limits chosen for many areas and times seem quite high. We believe that the FS needs to be conservative in authorizing use levels, especially when there is insufficient demand for high numbers of up to 75 people per day and when there is little information on impacts on brown bear and other wildlife from such large groups going ashore on what could become a daily basis. It is very difficult to reduce authorized capacities once commercial interests have developed potential revenue expectations and have invested accordingly.

To cite one area as an example of our concern, No Name Cove at the entrance to Tracy Arm is designated in the FS's "preferred alternative 5" to accommodate onshore groups of 75 people on any day in "all seasons." This allowance has been made in the absence of any critical analysis of the impacts of 75 people on the experience of smaller parties. There is also no meaningful assessment of the effects on wildlife in this cove.

As for demand, an observer who was anchored in No Name Cove the nights of July 2 and 3 this past summer noted that use appeared to be largely limited to boats planning to head up into Tracy Arm the following morning. There was no evidence of large group use ashore. If the FS has data to the contrary for this cove, it needs to display it in the FEIS. Page 3-15 suggests that such demand data do not exist for any area because it features the statement that "The largest guided group on the national forest reported in 1999 was 70 people from a tour boat. Most guided groups from tour boats range from 12 to 20 people in size." This raises a serious question as to how, based on such a low demand for 75-person groups, can the FS propose a "preferred alternative 5" with as many as 33 large groups "enclaves" and 14 "large group 15-percent areas."

Changes to the DEIS that would bring it more in line with the BBMT's recommendations would be to 1) provide demand data that demonstrate why such large groups need to be authorized so often and in so many areas, 2) describe more fully the impacts to bears and other wildlife habitat that are expected to result from

3/6

the proposed large numbers of people going ashore, 3) lower the group size and number figures for large groups, 4) provide better justification and basis for each of the "15 percent areas" and large group "enclaves," and 5) commit to a more proactive monitoring and testing plan to determine how meaningful the decision numbers really are and what the actual impacts to brown bear and other wildlife behavior are.

6. Allocation of Use. A major deficiency of the DEIS is that the FS has lumped all guided use into one category, so that the number of bear hunts or guides is not addressed at all. Moreover, the FS has figured carrying capacity in terms of group days, despite the argument we made that the number of hunts makes much more sense for bear guiding.

The DEIS does respond to our request that areas should also be managed for different capability targets based on group size, length of stay and type of use, but we remain concerned that large group areas will be managed too crudely to avoid user or human wildlife conflicts. A measure we recommend is for the FS to install a provision in which certain days of each week would be closed to any onshore use by large groups. That way, the person or small group that has wishes to use the area could schedule a trip on days when a large group is not authorized to go ashore.

Finally, we recommended that "some areas may be considered off limits for certain types of commercial activity &/or certain times of year." We suggested that "such restrictions may be applied when commercial activities or other human uses cause adverse impacts and reasonable alternative locations are available to accommodate the commercial use." An example of a commercial activity is aircraft landings on sensitive estuaries. An example of a time of year is the peak of an important subsistence salmon run. There is no discussion of this recommendation in the DEIS, and we ask that that the issue be addressed in the FEIS.

7. Nonresident Hunter and Hunting Guide Levels. The decision of the FS to leave consideration of brown bear guide and hunt numbers out of the DEIS is of grave concern to the BBMT. Our team recognized the explosive growth of guide numbers and an upward tendency in the number of bear hunts as key concerns, and spent a great deal of time evolving recommendations regarding them. We continue to believe that these concerns should be addressed in the FEIS, where their resolution will have the greatest chance of full public scrutiny and withstanding legal challenge. We have, however, been informed that the FS plans to address these issues in a subsequent administrative process. If our strong recommendation to deal with bear hunting matters in the FEIS is not accepted, we think it imperative that the alternative administrative process be spelled out in the FEIS so as to afford it some measure of NEPA validation. We strongly believe, further, that the FS needs to design an approach which does not lead to the same problem we have had in the past: applicants for bear hunting guide permits have been dealt with one-at-a-time, with no established criteria in place to defensibly cut off the number of bear guide permits issued in any particular area.

8. Minimizing Disturbance to Bears. Only 13 pages (3-102 through 3-115) address the environmental effects of the alternatives on wildlife, and only 2.5 of these pages (3-112 to 3-114) address impacts on brown bears. There is little information in these pages that actually describes the impacts on bears and other wildlife that can be expected to result from alternatives that accommodate numerous large groups. Moreover, the DEIS acknowledges on page 3-112 a paucity of research findings in Southeast Alaska as to the impacts of human pressure on bears along shorelines. It is incumbent on the FS to obtain essential impact data and information before proposing to unleash large groups of people on a frequent basis. At a minimum, the alternative selected in the FEIS should restrict large group sites to a much smaller number, more in line with present need. We reiterate that monitoring, periodic re-evaluation, and additional research are critical components of any mitigation management system.

9. Admiralty Island National Monument Status. Here again, our team recommendations appear not to have been incorporated. We find no assurance in the DEIS that the FS will complete the Comprehensive Admiralty Island Plan that we proposed to resolve significant land management issues and to bring the FS into compliance with the obligation for the agency to "protect" brown bear that is described in Section 503, of the Alaska Lands Conservation Act (ANILCA).

Appendix G—Response to Comments

STATE OF ALASKA OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

SOUTHCENTRAL REGIONAL OFFICE
550 W. 7TH AVENUE, SUITE 1600
ANCHORAGE, ALASKA 99501
PH: (907) 269-7470/FAX: (907) 269-3981

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3662/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 257-1351/FAX: (907) 272-3829

FRANK H. MURKOWSKI,
GOVERNOR

December 30, 2002

Bill Tremblay
USDA Forest Service
Tongass National Forest
204 Saginaka Way
Sitka, AK 99835-7316

Dear Mr. Tremblay:

SUBJECT: SHORELINE OUTFITTER/GUIDE DEIS
STATE ID. NO. AK 0207-21J
NEPA REVIEW

RECEIVED

JAN - 7 2003

PETERSBURG OFFICE
TONGASS N.F.

Similarly, the DEIS affords no assurance that the FS is committed to providing funding and other assistance to the Alaska Department of Fish and Game (ADF&G) for its studies of brown bear populations, density, and behavior. However, results of such studies are essential to management decisions made by the FS relative to this EIS.

Finally, the FS appears to have disregarded our recommendation that it restrict or prohibit long-term tent camps and shore-based utilities, attachments, or other support for floating camps or lodges. We urge acceptance of that recommendation into the chosen alternative in the FEIS.

10. Effects of Private Lands. There is inadequate discussion of our recommendation that in establishing shoreline carrying capacity, it is essential to consider the effects of existing as well as reasonably foreseeable private inholdings. The DEIS simply says, on page 3-57, that "Any additional recreational development on private lands in the future would likely increase recreation use on the adjacent national forest." The FEIS needs to specifically indicate for each large-group area how and to what degree such private land development has influenced or is expected to influence the large-group allocations featured in each alternative.

11. Areas Meriting Special Attention. We cannot find in the DEIS where the FS has identified the areas within designated Guide Use Areas (GUAs) that merit special attention. The BBMT was at considerable pains to evolve criteria for identification and management of "human/bear high use zones", and we were disappointed to see this concept given only lip service in the DEIS. We ask that it be incorporated in the FEIS as at least one tool for focusing management attention.

12. Community Stability. We see no accommodation in the DEIS of our proposals to 1) allocate a certain number of group days in each area to businesses with less than a certain number of employees, and 2) allow for the gradual, slower-paced planning and development of tourism and related activities in rural communities by allocating, before carrying capacity is reached, a certain number of group days in community home ranges to locally owned businesses. We understand that these are not simple matters, either legally or logistically, but ask that they be addressed in the FEIS to the degree feasible. For instance, gradually increasing the number of permits would be one way of leveling the playing field for local communities.


13. Socio-Economic Impact Analysis. The questions posed in our enclosed letter do not appear to have been answered in the DEIS. They represent significant issues and need to be dealt with in the EIS.

14. Subsistence. The DEIS is deficient in explaining how impacts on subsistence have been considered in the FS's determination of carrying capacity. It is critical for local people that their key use areas are not preempted by recreational use. For instance, heavy recreational use at the peak of an important subsistence fish run may well preclude use by locals. Please add an analysis of this matter in the FEIS.

We appreciate the chance to review and comment on the DEIS and look forward to the FS taking corrective action on the deficiencies that we have identified.

CC: Members, BBMT
MaryBeth Nelson, FS
Carol Goularte, FS
Marti Marshall, FS
✓ Bill Tremblay, FS
Paul Matter, FS
Pete Griffin, FS

Sincerely,


Greg Streveler, Chair
For members of the Unit 4 Brown Bear
Management Team

Enclosures:

- 1) May 6, 1999 letter from Greg Streveler to Fred Salinas, Assistant Forest Supervisor
- 2) 11/7/02 BOG resolution to FS

5

5/6

Shoreline O/G EIS
2,0-0084
12/30/02

1/2

The Division of Governmental Coordination (DGC) has completed coordinating the State's response to the U.S. Forest Service's Shoreline Outfitter/Guide Draft Environmental Impact Statement under the National Environmental Policy Act, and offers the enclosed comments from reviewers. DGC received comments from the Alaska Department of Fish & Game (ADF&G), including an Alaska Board of Game Resolution regarding guided brown bear hunting in Unit 4, as well as comments from the coastal districts of Sitka, Port Alexander, and Pelican, and Sealaska Corporation.

Scope of Project Reviewed

The activity subject to this review is a Draft Environmental Impact Statement for commercial outfitting and guiding activities on the shoreline of the Tongass National Forest in northern Southeast Alaska. The analysis area for this project includes approximately 7,018,700 acre of the Admiralty Island National Monument, and the Hoonah, Sitka and Juneau Ranger Districts. The shoreline zone of the analysis area extends one-half mile inland from mean high tide, and includes approximately 5,300 miles of shoreline. Eleven communities are within the analysis area: Juneau, Sitka, Port Alexander, Tenakee Springs, Pelican, Elfin Cove, Gustavus, Angoon, Hoonah, Haines and Skagway. Two areas on Admiralty Island are excluded in the DEIS: Mitchell Bay and environs, and the Peck Creek Zoological Area. The national forest shorelines associated with the Juneau and Sitka road systems are also not included.

The purpose of the project is to manage outfitter/guide use of the Tongass National Forest shoreline zone within the analysis area to balance commercial and non-commercial recreational uses. Guided visitor levels would be managed to maintain quality recreation experiences without degrading forest resources or the recreation experiences sought by both guided and unguided

Shoreline Outfitter/Guide DEIS
AK 0207-21J

Page 2

December 30, 2002

recreationists. The project is intended to determine the amount of carrying capacity allocated to commercial use, specify the types of commercial recreation activities permitted, specify methods of access approved for commercial use, specify the types and locations of areas where large groups can occur and under what conditions, specify mitigation measures for commercial recreation activities, and establish monitoring requirements. Five alternatives are analyzed in the DEIS, with Alternative 1 the "no action" alternative, and Alternative 2 the "preferred alternative."

Additional Information

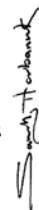
This project was initiated due to the expiration of the decision made from the *Chatham Area Outfitter/Guide Limited Use Environmental Analysis* (USDA Forest Service 1993). Following that expiration and in response to concerns over increases in recreation and tourism on the Tongass National Forest, the USFS placed moratoriums on permitting additional commercial outfitter/guide use in many locations. In 2001, the USDA Forest Service prepared the *Shoreline Recreation Carrying Capacity Analysis for Admiralty Island National Monument, Hoonah, Juneau, and Sitka Ranger Districts on the Tongass National Forest*. This EIS is intended to further analyze the potential effects of authorizing different levels of commercial outfitting and guiding activities within the shoreline zone of the analysis area.

Alaska Coastal Management Program (ACMP)

In addition to the NEPA process, federal agencies must meet applicable laws under the Coastal Zone Management Act (CZMA) (15 CFR 930 Subpart C) and the ACMP. The CZMA requires ACMP review of Forest Service permits for activities which would have a spillover effect outside the boundaries of the federal land, to the coastal zone. Should the activity cause effects relating to the State's standards of the ACMP, such as water quality or habitats, the Forest Service must obtain a State consistency finding prior to issuing a permit. The applicants for permits in the coastal zone must fill out a Coastal Project Questionnaire (CPQ), and the applicants' certificate of consistency (the last page of the CPQ) should be submitted to the Forest Service. Under the ACMP, each application must be scrutinized for effects to land and water uses and natural resources of the coastal zone, relating to any of the standards in the ACMP. The ACMP standards are enclosed, as well as a few CPQs for your distribution to applicants. The CPQ is available electronically at www.alaskacoast.state.ak.us.

If you have any questions regarding this process, please contact me at 907-465-8791 or email sandy_harbanuk@gov.state.ak.us.

Sincerely,



Sandy Harbanuk
Project Review Coordinator

cc: Distribution list

2/2

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME
DIVISION OF WILDLIFE CONSERVATION

134

FRANK H. MURKOWSKI,
GOVERNOR

P.O. BOX 25526
JUNEAU, AK 99802-5526
PHONE: (907) 465-4100
FAX: (907) 465-2332

30 December 2002

Tom Puchlerz
Forest Supervisor
Tongass National Forest
US Forest Service
Federal Building
Ketchikan, Alaska 99901

Dear Mr. Puchlerz:

Enclosed are two attachments for the Unit 4 Brown Bear Management Team comments on the Shoreline Outfitter/Guide DEIS. The comments were mailed to you 12/28/02 by Greg Streveler but as copies of these attachments were not available to him, he asked me to forward them under separate cover.

Please contact me at 907-465-6198 if you have any questions.

Sincerely,



Tom Paul
Program Coordinator

Cc: Mary Beth Nelson
Bill Tremblay

Shoreline O/G EIS
2.g-0086
12/30/02

1/9

RECEIVED

DEC 31 2002

PETERSBURG OFFICE
TONGASS N.F.

Appendix G—Response to Comments



Appendix A
DEPARTMENT OF FISH AND GAME
BOARD OF GAME

TONY KNOWLES, GOVERNOR

P.O. BOX 25328
JUNEAU, ALASKA 99805-5328
PHONE: (907) 465-4110
FAX: (907) 465-6294

May 6, 1999

Fred S. Salinas, Assistant Forest Supervisor
Chatham Area, Tongass National Forest
204 Signaka Way
Sitka, AK 99835

Subject: "Draft Chatham Area Saltwater Shoreline-based Recreation Carrying Capacity Analysis" and
"Proposed Action for Saltwater Shoreline-based Outfitting and Guiding on the Chatham Area"

Dear Mr. Salinas:

The purpose of this letter is to convey the Unit 4 Brown Bear Management Team's comments regarding your agency's August 1998 Draft Chatham Area Saltwater Shoreline-based Recreation Carrying Capacity Analysis and the associated Proposed Action for Saltwater Shoreline-based Outfitting and Guiding on the Chatham Area. The team, formed under the auspices of the Alaska Board of Game, represents a variety of shoreline users in state Game Management Unit 4, which includes Admiralty, Baranof, and Chichagof (ABC) islands.

The purpose of the Brown Bear Management Team is to review issues of resource management and any human activities in Unit 4 that affect brown bears, such as hunting, viewing, human access, and habitat alteration; agree on brown bear management goals and objectives; determine what changes are needed in current management to meet those goals and objectives; develop key elements of a management strategy that reflects those changes; and convey the strategy to the appropriate resource management agencies and regulatory boards with recommendations for their action.

The following are our specific recommendations for revision of the Draft Carrying Capacity Analysis and Proposed Action.

1. **Cooperation with the State.** The Forest Service needs to develop its shoreline carrying capacities in cooperation with the State of Alaska to ensure that they are meaningful. To effectively manage human shoreline use, it is essential to cooperatively address both state intertidal land below mean high tide and federal intertidal land and upland above mean high tide. The Forest Service and the state have recognized this reality in their cooperative management of the Pack Creek estuary.
2. **Groups.** The term "group" needs to be defined more clearly. As currently defined, a group includes up to 12 or more people. A group under this definition could include anywhere from one to an infinite number of people. Clearly, a single recreational user does not have the same impact as a group of 72 passengers from a medium-size cruise ship. Groups should be defined as small, medium, or large; the range in the size of these groups should be specified; and the allocation of group days should differ depending on the size of the groups, the objectives for the Land Use Designation (LUD) of the area in question, and the compatibility between existing uses.
3. **Explanation of carrying capacity criteria.** There needs to be further explanation of how the four kinds of carrying capacity criteria – ecological, physical, facility, and social – are actually applied in the carrying capacity analysis. The revised Tongass Forest Plan requires the Forest Service to consider

2/9

Printed on recycled paper.

Unit 4 Brown Bear Management
Team comments to Forest Service

2

May 6, 1999

whether "[t]he affected ecosystem(s) have the capability to accommodate the expected kinds of activities and amounts of use without degradation of ecosystem composition and structure." (see revised Forest Plan at 4-41, REC122 IL4.D(2)(a)). Certain sensitive wildlife species, such as brown bear, may be impacted by higher levels of recreation and tourism activities. Some important bear habitats may require lower carrying capacity figures.

4. **Management area size and monitoring.** For carrying capacity limits to be meaningful on the ground, the following considerations need to be incorporated:

- a. Manage human use by smaller subunits, if necessary and workable, to minimize user conflicts, promote research, or respond to management, bear population, or overcrowding issues.
- b. A monitoring and compliance plan needs to be a part of the plan/environmental document. It is essential for the public and agencies to understand how the capacity limits will be monitored. If limits are exceeded, how will that be detected and corrected? There also needs to be some formalized method of testing the predicted effects once the plan is implemented.

5. **Areas managed for less than maximum social or recreation carrying capacity.** Setting initial carrying capacity limits prior to authorization of actual use tends to be somewhat theoretical. Therefore carrying capacities should be re-evaluated on a regular basis and adjusted based on the impacts of actual use. Given the limited precision of brown bear population estimates, a limited understanding of the degree to which human activity disturbs bear behavior along shorelines, and the need to assess the compatibility between human uses, it is not prudent to unduly push carrying capacities to their apparent maximum limits.

The seasonal total use should not be based on the daily maximum use (service days or groups) times the number of days in the season. Rather, the seasonal total should be an "optimal" target that is a lower average number, so that when an area has reached its targeted carrying capacity, a user would find the maximum number of users or groups on some days but less than that number on other days. The balance used to find this "optimal" target will vary with specific sites, uses, and the experience the area is managed for.

6. **Allocation of use.** Where capacity levels are set, allocations between commercial and non-commercial use should be established. Consideration should be given to providing small business opportunities for residents of local communities within the immediate area. Areas should be managed for different capacity targets based on group size, length of stay, and type of use. Certain areas should be managed for low levels of use. Some areas may be considered off limits for certain types of commercial activity and/or during certain times of the year. Such restrictions may be applied when commercial activity or other uses cause adverse impacts, and reasonable alternative locations are available to accommodate the commercial use.

7. **Nonresident hunter and hunting guide levels.** To 1) maintain brown bear populations; 2) promote economic viability of the guide industry; and 3) minimize conflicts with other users, including subsistence, and in consideration of historical use patterns, the team recommends that:

- a) the allowable number of authorized bear guides be reduced by attrition to no more than 20; and,
- b) the total number of nonresident hunters be as per Alternative 2 of the Southeast Alaska Guide Association's proposal. See following table and discussion.

3/9

Response to Comments—Appendix G

c) allocation between spring and fall seasons will be based approximately on ADF&G data of historical breakdown between those seasons.

Guide Use Area	Current Average Historical Use (number of nonresident hunters)	Adjustment from current average use	Recommended total number of nonresident hunters	Rec. total number of non-resident guided hunters	Rec. total number of non-residents hunting with next-of-kin
4-01 SE Baranof	10		10	10	
4-02 SW Baranof	4	3	7	7	
4-03 Silika Area	3	1	4	4	
4-04 NE Baranof	12		12	11	1
4-05 SW Admiralty	15		15	15	
4-06 South Admiralty	19	-2	17	16	1
4-07 SE Admiralty	6		6	5	1
4-08 North Admiralty	2		2	1	1
4-09 Seymour Canal	8		8	6	
4-10 NW Admiralty	9		9	9	
4-11 NE Chichagof	9		9	9	
4-12 Tenakee Inlet	14		14	14	
4-13 Hoonah Sound	22	-4	18	16	
4-14 SW Chichagof	4	2	6	6	
4-15 NW Chichagof	6		6	6	
4-16 North Chichagof	4	1	5	6	
Total	147	1	148	144	4

We took the historic use for each Guide Use Area and then made slight adjustments to the amount of allowed use based upon practical experience. Some areas are currently over-utilized, particularly during parts of the season, while other areas are under-utilized. This is an issue of crowding, not the ability of an area to produce bears. To account for this, an adjustment has been made to some areas based upon the

4/9

experience of guides in those areas. This adjustment is upward in areas that are under-utilized and downward in areas that are over-utilized.

Four Guide Use Areas have had an average of one nonresident hunting with next-of-kin annually in recent years. In those areas we have recommended that the annual number of guided nonresident hunters be reduced by one to accommodate those nonresidents hunting with next-of-kin. Nonresidents also hunt with next-of-kin in other GUAs, but not on a consistent enough basis for us to recommend reducing the number of guided nonresident hunters.

We believe that this alternative will reduce pressure where overcrowding is the worst and allow this pressure to shift to areas which are currently under-utilized. There are no major adjustments recommended to historic use, and additional adjustments could be made on an area by area basis as experience is gained under the new system.

8. Minimize disturbance to bears. The number, timing, and location of bear and recreational outfitter/guides need to be managed to minimize disturbance to bears and their habitat.

9. Admiralty Island National Monument status. In 1901, President Roosevelt endorsed a bear sanctuary for Admiralty Island. In 1932, a bear management plan for the island was issued by the Alaska Game Commission and the U.S. Forest Service. The plan gave bears a high priority in the management of the island. In 1978, the Alaska Board of Game's ABC Management Plan specified the primary management goal of hunting brown bears under "aesthetically pleasing" conditions. In 1978, President Jimmy Carter, in Proclamation 4611, stated "Unusual aspects of the island ecology include its exceptional distribution of animal species, including dense populations of brown bear. The island is an outdoor living laboratory for the study of bald eagle and Alaskan brown bear." These and numerous other historical statements concerning Admiralty's special status were reinforced when Congress passed ANILCA in 1980, giving a large portion of Admiralty Island national monument status.

Under Sec. 503 (c) of ANILCA the U.S. Forest Service was directed to "protect objects of ecological...and scientific interest." 16 USC Sec. 431. The legislative history of ANILCA makes clear that one of the primary resources Congress considered in giving Admiralty Island National Monument and Wilderness status was its brown bear population. Both the language of the act and the legislative history reinforce the view that Admiralty Island must be considered "special", when it comes to brown bear management.

In order to determine whether the Forest Service has met its obligation to "protect" brown bears as mandated in Sec. 503 of ANILCA, the team believes that two essential actions must be taken.

- 1) First, the USFS must complete a Comprehensive Admiralty Island Plan through a public process which addresses, among other concerns, the steps the agency has taken to fulfill its statutory mandate, and the measures that will be taken to account for future changes in bear populations, habitats, and hunting pressures.
- 2) Second the USFS must demonstrate its commitment to bear protection by working collaboratively with the Alaska Department of Fish and Game and by providing funding and other assistance to the Alaska Department of Fish and Game for its studies of brown bear populations, density, and behavior.

5/9

Appendix G—Response to Comments

Unit 4 Brown Bear Management
Team comments to Forest Service

5

May 6, 1999

In addition, the USFS should consider, and where appropriate adopt, the following specific measures to assure that Admiralty's special status in relation to the rest of GIMU 4 is recognized:

- Restrict or prohibit long-term tent camps;
- Restrict or prohibit shore-based utilities, attachments, or other support for floating camps or lodges.

By advocating these specific measures for Admiralty Island National Monument, the team is not suggesting that they are inappropriate for the rest of GIMU 4. They may well be necessary management tools for any area in the Unit. The team believes, however, that these measures could be particularly useful in allowing the USFS to meet its legal obligation to provide special protection for brown bears on Admiralty Island.

10. **Effects of private lands.** Forest Service decisions need to reflect the fact that private inholdings represent a significant non-permitted/non-regulated use of the shoreline. For example, a lodge can create a base of operation that at times dominates a bay. Non-guided hunts out of such a facility can account for a substantial use of nearby national forest shorelines.

When establishing shoreline carrying capacity, it is essential to consider the effects of existing private inholdings, and those of potential inholdings that will be created by conveyance of Native Allotments, most of which could become sites for lodges (three pending allotments in Mitchell Bay, one pending in Whitewater Bay, one pending in Windfall Harbor, and one pending in Little Pybus Bay).

11. **Areas meriting special attention.** While it makes sense to use state designated Guide Use Areas (GUAs) to determine carrying capacities, the Forest Service should evaluate whether particular areas within the GUAs merit special attention. Special attention could include lower use limits, more monitoring, smaller management units, or perhaps closures to certain types of use. The Forest Service seems to assume that users will spread out naturally throughout the GUAs. This is not necessarily the case. The agency also seems to assume that users will be satisfied to spread out to avoid other users and that all areas within a GUA will support the same quality of experience. This assumption needs to be explained. A monitoring plan also needs to be in place to verify assumptions used in developing carrying capacities.

Southeast Alaska communities and residents all have "special areas" which are important for a number of uses, including recreation and tourism. The Revised Forest Plan directs the Forest Service to minimize "[a]dverse impacts to popular or highly-valued local areas with outfitter/guide operations" when authorizing outfitter/guide operations. (see Revised Forest plan at 4-41, REC122 II.4.d(2)(c)). To comply with this direction the agency should work with communities and individuals to identify these special areas and to set carrying capacity targets which respond to community and resident needs.

12. **Community stability.** Community stability should be a cornerstone of carrying capacity decisions. To provide for small business opportunities in recreation and tourism in the Unit 4 area, two measures should be considered:

- 1) allocating a certain number of group days in each area to businesses with less than a certain number of employees; and
- 2) allow for the gradual, slower-paced planning and developing of tourism and related activities in rural communities by allocating, before carrying capacity is reached, a certain number of group days in community home ranges to businesses owned by local community residents. Such a program could

6/9

Unit 4 Brown Bear Management
Team comments to Forest Service

6

May 6, 1999

be initiated in the spirit of the Small Business Administration or the Small Sales Timber Salvage Program.

13. **Socio-economic impact analysis.** As part of the environmental document, the Forest Service should complete a socio-economic impact analysis. Information needs to be added to the planning document that shows how the proposed carrying capacity and outfitter/guide allocations will affect current and future businesses. Questions in need of answers include: are existing outfitters already using the entire commercial allocation in some areas? Is there room for additional growth in others? What impacts would result if the full allocation of outfitter/guide permits are given out in any one area? Will there be more impacts in other areas? Will guides be displaced into less desirable areas? What is the level of outfitter/guide activity that is authorized in areas planned for future timber sales?

14. **Subsistence.** Impacts to subsistence must also be considered when determining carrying capacity. The Revised Forest Plan directs the agency to minimize "adverse impacts to subsistence users" when authorizing outfitter/guide operations. (see Revised Forest plan at 4-41, REC122 II.4.d(2)(f)).

Sincerely,



Greg Stueveler, Chair
for members of the Unit 4 Brown Bear Management Team

Bruce Baker, Friends of Admiralty, SEACC, Sitka Conservation Society
Jerry Barber, Sitka Fish and Game Advisory Committee
Steve Behnke, Alaska Wilderness and Recreation Tourism Association
Bob Engelbrecht, Alaska Visitors Association
Paul Grant, Admiralty Bear Association
Dave Helmick, Petersburg Fish and Game Advisory Committee
Bob Hinman, Territorial Sportsmen
Paul Johnson, Southeast Alaska Guide Association, Alaska Professional Hunters Association
Mim McConnell, Port Alexander Fish and Game Advisory Committee
Ken Schoonover, Huna Totem Corporation
Jack Whitman, Alaska Department of Fish and Game
Eruk Williamson, Alaska Board of Game

cc: Governor Tony Knowles
Rick Cables, Regional Forester, USDA Forest Service Region 10
Jim Caplan, Deputy Regional Forester, USDA Forest Service Region 10
Tom Puchler, Forest Supervisor, Tongass National Forest
Marti Marshall, Recreation Specialist, USFS Chatham Area
Frank Rue, Commissioner, Alaska Department of Fish and Game
John Shively, Commissioner, Alaska Department of Natural Resources
Mary Rutherford, Deputy Commissioner, Alaska Department of Natural Resources
Wayne Reglin, Director, ADF&G Division of Wildlife Conservation
Lori Quakenbush, Chair, Alaska Board of Game

7/9

Response to Comments—Appendix G

Alaska Board of Game Resolution

Request to the U.S. Forest Service Regarding Management of Guided Brown Bear Hunting in Unit 4

Whereas, the Board of Game has since the early 1990s heard testimony from the public and from management agencies concerning user conflict and potential over-harvest or displacement of brown bears in Unit 4; and

Whereas, in 1995 the Board of Game responded to these concerns by establishing a "Southeast Alaska Brown Bear Committee" to review the situation; and

Whereas, this committee reported to the Board of Game that year that the best solutions to two central problems – the proliferation of bear hunting guides and capping harvest – were outside state control, and that the U.S. Forest Service, whose authority did allow direct control of guide numbers and guide-by-guide allocation of harvest, was not intended to exercise control without a National Environmental Protection Act (NEPA) process; and

Whereas, the Brown Bear Committee, as a result, disbanded without effecting significant change in the status quo; and

Whereas, at the Board of Game fall 1998 meeting, testimony from the U.S. Forest Service that a NEPA process was now under way to establish a framework for controlling guide and guided hunt numbers and other related actions in collaboration with the Alaska Dept. of Fish and Game; and

Whereas, this testimony from the U.S. Forest Service, and a number of proposals illustrating continued public concern over several aspects of brown bear management centering on Unit 4, prompted the Board of Game to establish a "Unit 4 Brown Bear Management Team (BBMT)" comprised of two board members, a broad array of public interests, as well as U.S. Forest Service and Alaska Dept. of Fish and Game representatives; and

Whereas, this team, after two years of deliberation, produced by consensus a "Management Strategy for Brown Bear Management in Unit 4" which was unanimously accepted by the Board of Game at their fall 2000 meeting; and

Whereas, this document again flagged the proliferation of guides and hunt allocation as very important concerns; and

Whereas, the U.S. Forest Service responded in August 2000, by placing a moratorium of issuance of new bear guiding permits for Unit 4 (and Unit 1), pending outcome of the NEPA process intended to deal with these matters; and


Whereas, the U.S. Forest Service decided during the NEPA process to defer consideration of matters related to brown bear hunting; as a consequence, the draft "Shoreline Outfitter/Guide EIS" produced in July 2002, failed to address these issues; and

Whereas, the U.S. Forest Service has recently stated its intent to deal with issues related to guided brown bear hunting in an additional, unspecified process once the NEPA process is final.

Now be it resolved that the U.S. Forest Service is respectfully requested

- to maintain the moratorium on new guiding permits until the additional process addressing guided brown bear hunting is in place and has reached appropriate decisions; and
- to describe the process and timeline envisioned for arriving at and implementing a policy on matter related to brown bear hunting, including plans the U.S. Forest Service may have for public and other agency involvement

Vote: 6/0
November 7, 2002
Juneau, Alaska


Ben Grussendorf, Chair
Alaska Board of Game

Appendix G—Response to Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

DEC 30 2002

Reply To
Attn Of: ECO-088

Ref: 01-022-AFS

Mary Beth Nelson
Attn: Shoreline Outfitter Guide
USDA Forest Service,
Tongass National Forest
204 Siginaka Way
Sitka, AK 99835-7316

Dear Ms. Nelson:

The Environmental Protection Agency (EPA) reviewed the draft Environmental Impact Statement (DEIS) for the proposed **Shoreline Outfitter/Guide**, dated June 21, 2002 in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 of the Clean Air Act specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

EPA Region 10 used a screening tool to conduct a limited review of the draft EIS and based upon the screen, we did not foresee having major environmental objections to the proposed project. Therefore, we decided not to conduct a detailed review of the draft.

Should you have any questions, please feel free to contact Mr. Jonathan Freedman of my staff at (206) 553-0266.

Sincerely,

Judith Leckrone Lee
Judith Leckrone Lee, Manager
Geographic Implementation Unit

cc: Alaska Department of Environmental Conservation

Shoreline O/G EIS
2/9-0088
12/30/02

Printed on Recycled Paper

1/2

01-02-03 02:18pm From: DIV OF COORD

907 465 3073

T-441 P.001 F-170

FAX TRANSMITTAL

STATE OF ALASKA
OFFICE OF THE GOVERNOR
FRANK H. MURKOWSKI
GOVERNOR
LOREN LEMAN
LIEUTENANT GOVERNOR



DIVISION OF GOVERNMENTAL
COORDINATION
PO BOX 110030
JUNEAU, AK 99811-0030
Telephone: (907) 465-3562
Fax: (907) 465-3075

Date: December 30, 2002
Pages: 36 + this page

From: Sandy Harbanuk - Project Review Coordinator
Phone: 907/465-8791

To: Bill Tremblay 5825
Fax: 907/747-4334 772-5843
Re: Shoreline Outfitter/Guide DEIS

The attached is the State response to your request for comments for the Shoreline Outfitter/Guide DEIS. The hard copy will be mailed today.

Shoreline O/G EIS
2/9-0088
12/30/02

If you received this FAX in error, please immediately notify the sender by telephone, and return this FAX to the sender at the above address. Thank you.

1/37

Response to Comments—Appendix G

01-02-03 02:20pm From:DIV OF COORD T-841 P.003 F-170

01-02-03 02:20pm From:DIV OF COORD T-841 P.002 F-170

01-02-03 02:20pm From:DIV OF COORD T-841 P.002 F-170

STATE OF ALASKA OFFICE OF THE GOVERNOR

FRANK H. MURKOWSKI,
GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

☐ SOUTHCENTRAL REGIONAL OFFICE
550 W. 7TH AVENUE, SUITE 1600
ANCHORAGE, ALASKA 99501-2343
PH: (907) 257-4200 FAX: (907) 268-3881

☐ REGIONAL COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 257-1551 FAX: (907) 272-3829

December 30, 2002

Bill Tremblay
USDA Forest Service
Tongass National Forest
204 Saginaw Way
Sitka, AK 99835-7316

Dear Mr. Tremblay:

SUBJECT: SHORELINE OUTFITTER/GUIDE DEIS
STATE ID. NO. AK 0207-21J
NEPA REVIEW

The Division of Governmental Coordination (DGC) has completed coordinating the State's response to the U.S. Forest Service's Shoreline Outfitter/Guide Draft Environmental Impact Statement under the National Environmental Policy Act, and offers the enclosed comments from reviewers. DGC received comments from the Alaska Department of Fish & Game (ADF&G), including an Alaska Board of Game Resolution regarding guided brown bear hunting in Unit 4, as well as comments from the coastal districts of Sitka, Port Alexander, and Pelican, and Sealaska Corporation.

Scope of Project Reviewed

The activity subject to this review is a Draft Environmental Impact Statement for commercial outfitting and guiding activities on the shoreline of the Tongass National Forest in northern Southeast Alaska. The analysis area for this project includes approximately 7,018,700 acre of the Admiralty Island National Monument, and the Hoonah, Sitka and Juneau Ranger Districts. The shoreline zone of the analysis area extends one-half mile inland from mean high tide, and includes approximately 5,300 miles of shoreline. Eleven communities are within the analysis area: Juneau, Sitka, Port Alexander, Tenakee Springs, Pelican, Elfin Cove, Gustavus, Angoon, Hoonah, Haines and Skagway. Two areas on Admiralty Island are excluded in the DEIS: Mitchell Bay and environs, and the Pack Creek Zoological Area. The national forest shorelines associated with the Juneau and Sitka road systems are also not included.

The purpose of the project is to manage outfitting/guide use of the Tongass National Forest shoreline zone within the analysis area to balance commercial and non-commercial recreational uses. Guided visitor levels would be managed to maintain quality recreation experiences without degrading forest resources or the recreation experiences sought by both guided and unguided

Shoreline Outfitter/Guide DEIS Page 2 December 30, 2002
AK 0207-21J

recreationists. The project is intended to determine the amount of carrying capacity allocated to commercial use, specify the types of commercial recreation activities permitted, specify methods of access approved for commercial use, specify the types and locations of areas where large groups can occur and under what conditions, specify mitigation measures for commercial recreation activities, and establish monitoring requirements. Five alternatives are analyzed in the DEIS, with Alternative 1 the "no action" alternative, and Alternative 2 the "preferred alternative."

Additional Information


This project was initiated due to the expiration of the decision made from the *Chatham Area Outfitter/Guide Limited Use Environmental Analysis* (USDA Forest Service 1993). Following that expiration and in response to concerns over increases in recreation and tourism on the Tongass National Forest, the USFS placed moratoriums on permitting additional commercial outfitting/guide use in many locations. In 2001, the USDA Forest Service prepared the *Shoreline Recreation Carrying Capacity Analysis for Admiralty Island National Monument, Hoonah, Juneau, and Sitka Ranger Districts on the Tongass National Forest*. This EIS is intended to further analyze the potential effects of authorizing different levels of commercial outfitting and guiding activities within the shoreline zone of the analysis area.

Alaska Coastal Management Program (ACMP)

In addition to the NEPA process, federal agencies must meet applicable laws under the Coastal Zone Management Act (CZMA) (15 CFR 930 Subpart C) and the ACMP. The CZMA requires ACMP review of Forest Service permits for activities which would have a spillover effect, outside the boundaries of the federal land, to the coastal zone. Should the activity cause effects relating to the State's standards of the ACMP, such as water quality or habitats, the Forest Service must obtain a State consistency finding prior to issuing a permit. The applicants for permits in the coastal zone must fill out a Coastal Project Questionnaire (CPQ), and the applicants' certificate of consistency (the last page of the CPQ) should be submitted to the Forest Service. Under the ACMP, each application must be scrutinized for effects to land and water uses and natural resources of the coastal zone, relating to any of the standards in the ACMP. The ACMP standards are enclosed, as well as a few CPQs for your distribution to applicants. The CPQ is available electronically at www.alaskacoast.state.ak.us.

If you have any questions regarding this process, please contact me at 907-465-8791 or email sandy_harbanuk@gov.state.ak.us.

Sincerely,


Sandy Harbanuk
Project Review Coordinator

cc: Distribution list

2/37

3/37

Appendix G—Response to Comments

01-12-03 02:20pm From:DIV OF COORD T-441 P.004 P-170

DEC.10.2002 8:28PM SITKA COASTAL MNGT

NO.259 P.2



City and Borough of Sitka

100 Lincoln Street • Sitka, Alaska 99835

December 10, 2002

Sandy Harbaumuk
Project Review Coordinator
Division of Governmental Coordination
PO Box 110030
Juneau AK 99811-0030

RE: Shoreline Outfitter/Guide DEIS (Guided Recreation)

AK 0207-21J

Dear Ms. Harbaumuk:

Administrative Services Coordinator Este Fielding and I have reviewed this Draft Environmental Impact Statement for consistency with the Sitka Coastal Management Program. Obviously a great deal of effort and expense has gone into this DEIS, and these staff efforts are sincerely appreciated. However, the draft is very large and it is difficult to review the various alternatives, especially on a site-specific basis. Much of the report is predicated on certain amounts of commercial use, but these commercial uses will be superimposed on already heavy public use of many of these areas, especially those areas within the Sitka Coastal District which receive the greatest or most outstanding site-specific recreation and/or subsistence uses or which have very high-value resource values. Since this intensive public use is not quantified, there is a potential for considerably increased use "pressures" on certain high value areas such as the Special Management Areas identified in the Public Use Management Plan.

Special Management Areas (SMA's) are only briefly mentioned in the DEIS under one Use Area Card (04-03 Sitka Area, Appendix A page 54). SMA's occur within every Use Area Card within the Sitka Ranger District and within seven of the proposed large group enclaves. The magnitude of their significance is more than "of particular importance to residents." The Sitka District Coastal Management Program completed a significant amendment in 1993 entitled "Public Use Management Plan." The purpose of this was "to identify the most outstanding site-specific recreation and/or subsistence use areas within the Sitka Coastal District outside the Sitka road system, and to propose management guidelines and/or enforceable policies for these areas to maintain existing uses and limit use conflicts, consistent with the regulatory authorities of the land and water management agencies" (Public Use Management Plan, pg. 1).

It is almost impossible to review the proposed Alternatives in relation to the Coastal Program without looking at site-specific impacts. With no idea where commercial activities might be

Providing for today...preparing for tomorrow

4/37

01-12-03 02:21pm From:DIV OF COORD

DEC.10.2002 8:28PM SITKA COASTAL MNGT

NO.259 P.3

Sandy Harbaumuk
December 10, 2002
Page 2 of 10

permitted (except for large-group enclaves, which have boundary drawings), one can only assume that they could be permitted (except as excluded) in Special Management Areas which already are very important public-use and high-value resource areas. Since these areas are highly desirable use areas for the many participants in the Public Use Management Plan, it is likely these same destinations would be desirable to commercial outfitter-guides as well. While there is not nearly enough site-specific information to come to a conclusion about consistency with Sitka Coastal Management Program, except perhaps for the large-group impacts, there are certainly concerns about the potential for adverse impacts to users of these areas, and to the resources they include, if commercial outfitter/guide activities are conducted in these same areas. Therefore, as a general policy, it would seem prudent to not permit outfitter/guide activities that could displace public uses in the Special Management Areas unless there is clearly no significant conflict or potential for damage to the resources.

The five alternatives are too vague to effectively comment on in general, although some observations may be helpful.

Alternative 1- Current Use. Obviously this does not adequately manage outfitter/guide use of the Tongass while balancing other uses and limiting use conflicts and resource impacts.

Alternative 2 may be acceptable if concerns within the Use Area cards as stated previously are addressed and Special Management Areas are in general excluded from commercial uses if substantial adverse impacts would result.

Alternative 3. Up to 50% of the total recreation carrying capacity would be an excessive amount of commercial use considering that commercial users are a very small part of the total users of the Tongass. This probably would be unacceptable to other users due to the high possibility of conflict.

Alternative 4. Use of up to 8% of the total recreation carrying capacity is probably too restrictive on commercial use to accommodate the unmet needs and therefore may be unrealistic. However, it is an acceptable alternative from a public use/resource standpoint.

Alternative 5. This appears to be the most realistic alternative to provide both commercial outfitter/guide opportunities, which the Sitka Coastal Management Program supports for economic development reasons, and better control on where outfitter/guide activities occur. However, the final alternative should recognize existing public uses and not overly intrude into Special Management Areas or other highly significant public use/resource value areas that could be seriously adversely impacted by these commercial uses, unless it is clear no undue harm to current public use or resource values would occur.

It would be much more efficient to review proposed commercial use areas if it were known exactly where and for what use these areas will be designated, rather than leaving vast tracts of the National Forest open to potential commercial use without any specific review of impacts to that location. If the Forest Service continues to propose a region-wide opening of Tongass lands to commercial outfitter/guide uses, and selects one of the above alternatives, or a hybrid, then it should have clear policies available to denote what areas would be open to commercial uses

5/37

Response to Comments—Appendix G

01-02-03	02:21pm	From-DIV OF COORD	807 465 3075	T-841	P.007/037	F-170
DEC.10.2002	01:30PM	SITKA COASTAL MNGT		NO.259	P.5	
Sandy Harbansuk December 10, 2002 Page 4 of 10						
04-02B Whale Bay Avost Lake FS Cabin Pionkof Lake and Davidof Lake FS Cabins, Lakes, Trail Port Banks Redfish Bay Sockeye Stream and Lake System Secluded Bay (Necker Bay)/Benzan Lake Sockeye Stream and Lake System Yaman Cove and Islets; Slate Islets; Guibert Islets						
04-03 Sitka Area Allan Point FS Cabin Brent's Beach FS Cabin and Kamanoi Beach Chalchei Islands; Unnamed Islands Fish Bay Hot Springs and Trail Fred's Creek FS Cabin; Mt. Edgecombe National Recreation Trail Head of Krestof Sound through Dry Pass; Road to Gilmer Bay Iria Meadows; Shelkof FS Cabin, Trail and Bay; Road to Mud Bay Kakul Narrows FS Shelter Kalinin Bay Lessofkaina Bay Magoun Islands/Port Krestof Marine Park Nakwaina Passage to head of Nakwaina Sound Neva Strait FS Shelter North Beach Shelkof FS Cabin Piper Island FS Cabin Pirate's Cove; Samson Cove FS Cabin and Cove; Three Entrance Bay Salmon Lake FS Cabin, Lake and Trail; Trail to Redoubt Lake Sealion Cove and Trail Sigmatka Islands Sitka Public Recreational Facilities Tidelands Situkin Island St. Lazarus Island Solola Lake FS Cabin, Lake and Trail 04-04A Lake Eva, Rodman Bay Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System 04-04B Kelp Bay Hanus Bay; Portages; Dead Tree Islands Kelp Bay Basin and Pond Island 04-04C Burnoff Warm Springs Burnoff Warm Springs FS Cabin, Lake and Trail; Sedie Lake and Trail 04-12 Tenakee Inlet Kadashan Bay Kook Lake FS Cabin, Lake and Trail; Basket Bay; Kook Lake Sockeye Stream and Lake System 04-13 Peil Strait Rig Bear/Baby Bear Bays State Marine Park Fick Cove Lisianski River, Lake and Trail (continues into use area card 04-15)						

7/37

01-02-03	02:21pm	From-DIV OF COORD	807 465 3075	T-841	P.008	F-170
DEC.10.2002	01:25PM	SITKA COASTAL MNGT		NO.259	P.4	
Sandy Harbansuk December 10, 2002 Page 3 of 10						
<p>based on what criteria, as well as how non-commercial, public users and the resources of these areas would be protected. At the least, it would be beneficial as a general rule to exclude Special Management Areas from commercial use unless such use (such as a small group hiking a trail) would cause little adverse impacts to other uses or resources. There should also be an opportunity for a public process to have input into issuance and renewal of outfitter/guide permits, to ensure that a permit is not being misused, causing serious adverse impacts to other users, or damaging resources. Since these permits will be used in remote locations, it will be very difficult for the Forest Service to determine whether or not a specific site is suitable for a permit and to monitor what the outfitter/guide's activities under the permit cause in the way of impacts without input from other users and concerned persons, especially if there are problems.</p> <p>While decisions must be made on a site-specific, project-specific basis, it is likely all alternatives should be modified so that any proposed large group enclaves do not occur within SMA's unless there is some extremely strong justification for this use and it can be demonstrated that no significant adverse impacts to public use or resource values would occur. A large group of up to 75 people can have substantially greater impacts than small groups of six or less. Large group use of SMA's other than perhaps trails is highly likely to cause adverse impacts at a level unacceptable to other users and resources.</p> <p>It is the intent of the Sitka District to preserve Special Management Areas for future public use and maintenance of resources. Commercial group use proposed by the Shoreline Outfitter/Guide DEIS has a potential to significantly impact public use and resource values within Special Management Areas and the Sitka Coastal Management District as a whole. Use by commercial groups may conflict with subsistence and recreational uses by the public. Furthermore proposed large group enclaves and their use by groups of up to seventy-five people at a time may compromise habitat as well as resource values. The Sitka District is concerned about these potential conflicts and impacts. If commercial use as proposed by the DEIS is allowed, these concerns should be addressed on a site specific basis. Conflicts with public users should be minimized. Impacts to the resource (whether that may be habitat, viewpoints, recreational experience, etc.) must be minimized or at the very least least mitigated, or unacceptable harm could result.</p> <p>Following is a list of the Use Area Cards within the Sitka Ranger District and the Special Management Areas that fall within them:</p>						
04-01A Gut Bay, Baranof Red Bluff Bay; Falls Lake Sockeye Stream and Lake System 04-01B Port Armstrong Sashin Lake Trail 04-02A Redoubt Lake Goddard Hot Springs; Kolosh Island; Kitcherov Bay; Trail to Redoubt Lake Kanga Bay FS Cabin Redoubt Lake FS Cabin and Lake; Redoubt Sockeye Stream and Lake System Seventeenth Bay FS Cabin Tuigid Islands West Redoubt Bay Islets						

6/37

Appendix G—Response to Comments

01-10-03 02:22pm From:DIV OF COORD T-441 P.008/037 F-170

DEC.10.2002 8:30PM SITKA COASTAL MNGT NO.259 P.6

Sandy Harknisk
December 10, 2002
Page 5 of 10

Moose Island FS Cabin; Adjacent Seal Rookery
Ostrea Island FS Shelter
Sitkoh Lake FS Cabins, Lake and Trail; Upper Sitkoh Bay and Tidelands; Sitkoh Lake
Sookeye Stream and Lake System
Vash Bay
Vash Islands Seal Haulouts
04-14 Sitkoh Arm
Ford Arm Sookeye Stream and Lake System
King Bay Sookeye Stream and Lake System
Lake Anna Sookeye Stream and Lake System
Leo Anchorage Sookeye Stream and Lake System
04-15 West Chichagof
Dudrickson Trail and Lake
Goulding Lakes FS Cabin; Goulding Harbor, Trail and Lake System
Lisianski River, Lake and Trail; North Arm Hoonah Sound Tidelands
Myriad Islands and White Sisters Islands
White Sulphur Hot Springs, FS Cabin, Lake and Trail; Mirror Harbor, Sea Level Slough;
Dry Pass Trail and Harbor

In reviewing this DEIS a primary concern is the impact of private commercial use on access and use by the public for which the SMA's are managed. The following Enforceable Policies from the PUMP and SCMP are relevant to commercial group use within Special Management Areas (and to some degree outside the SMA's as well) which may generate use conflicts between commercial groups and the recreational and subsistence users of the SMA's:

PUMP Enforceable Policy 6 Pg. 19 states in part: "Where feasible and prudent, all land- and water-based uses which conflict with the management of the Special Management Areas shall be prohibited." The SMA's are of great importance to subsistence and recreational users. They are managed with the intent of preserving the resource values for continued public recreational and subsistence use. Commercial group use which conflicts with these public uses or causes resource damage is not recommended.

PUMP Enforceable Policy 5 Pg. 18: "Where feasible and prudent, a 'buffer strip' of 100 feet shall be maintained on each side of all trails listed as Special Management Areas, for the protection of the trails and the recreational experience. If it would be necessary to cause a significant adverse impact to the trail, the trail should be relocated where the buffer can be maintained. Where feasible and prudent, all viewpoints, scenic areas, and other unique recreational features of the trail shall be protected." Commercial group use could significantly impact trail condition; therefore Policy 5 applies.

SCMP Enforceable Policy 3.1 Pg. 134 is also relevant to uses within SMA's. Commercial group use should not conflict with traditional activities or compromise resource values. Adverse impacts to the resource or the experience of recreational users should be minimized or mitigated.

8/37

01-10-03 02:22pm From:DIV OF COORD T-441 P.008/037 F-170

DEC.10.2002 8:30PM SITKA COASTAL MNGT NO.259 P.7

Sandy Harknisk
December 10, 2002
Page 6 of 10

"To the extent feasible and prudent, the following criteria shall be utilized in land and water management decision-making affecting areas widely used for recreational purposes including, but not limited to, those areas listed in policies 3.3 and 3.4:

- 1) Habitat and access shall be maintained for traditional activities including hunting, fishing, clamming, beachcombing, hiking, nature observation, and other recreational uses;
- 2) The visual and aesthetic characteristics of recreational areas shall be protected and maintained;
- 3) The proposed use or activity shall minimize adverse impacts on recreational uses;
- 4) Significant adverse effects upon the habitat or qualities upon which the recreation depends shall be avoided or mitigated."

SCMP Enforceable Policy 3.4 Pg. 135, states: "Recreation and/or preservation of the resource shall be a high-priority use of the following heavily utilized areas within the City and Borough of Sitka, and to the extent feasible and prudent, the portions of these areas in the public domain shall be protected and maintained for recreational use:

- 1) Goddard Hot Springs (local government)
- 2) White Sulphur Hot Springs (federal government)
- 3) Publicly-owned portion of Barnof Warm Springs north of the river (local, state or federal government)
- 4) Mt. Edgecumbe National Recreation Trail (federal government)
- 5) US Forest Service Cabin sites and adjacent areas (federal government)
- 6) Other areas in the public domain may be added to this list through amendment to the SCMP."

The Use Area Cards that contain these areas are 04-02A Redoubt Lake (contains Goddard Hot Springs), 04-15 West Chichagof (contains White Sulphur Hot Springs), 04-04C Barnof Warm Springs, 04-03 Sitka Area (contains Mt. Edgecumbe National Recreation Trail).

SCMP Enforceable Policy 9.1 Pg. 96 is relevant to any area utilized for subsistence: "Land and water uses and activities within the District shall minimize and/or mitigate significant adverse impacts, including cumulative impacts, on subsistence resources and their use. If a substantial concentration of the resource could be significantly adversely impacted by a proposed use or activity, protection of the resource shall be a priority consideration. Important subsistence resources include: razor clams, black and other seaweeds, salmon (especially sockeye), halibut, deer, herring eggs, smelt, rockfish, abalone, crab, clams, shrimp, mussels, gumbos, goat, bear, ducks and other waterfowl, berries, fur bearers, sea otters, and seals."

Likewise, SCMP Enforceable Policy 9.3 Pg. 96 is also relevant to any area utilized for subsistence: "Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law." The following SMA's receive heavy subsistence use and should be protected:

Red Bluff Bay; Falls Lake Sookeye Stream and Lake System
Goddard Hot Springs; Kolosh Island; Klinckevold Bay; Trail to Redoubt Lake
Redoubt Lake FS Cabin and Lake; Redoubt Sookeye Stream and Lake System
Redfish Bay Sookeye Stream and Lake System

9/37

Response to Comments—Appendix G

01-02-03 02:23pm From: DIV OF COORD 907 485 3075 T-641 P.010/037 F-170

DEC.10.2002 8:52PM SITKA COASTAL MNGT NO.259 P.9

Sandy Barhamuk
December 10, 2002
Page 8 of 10

Ford's Creek FS Cabin; Mt Edgecombe National Recreational Trail
Isis Meadows; Shelkoff FS Cabin, Trail and Bay; Road to Mud Bay
North Beach Shelkoff FS Cabin
Piper Island FS Cabin
Pirate's Cove; Sunning Cove FS Cabin and Cove; Three Entrance Bay
Salmon Lake FS Cabin, Lake and Trail; Trail to Redoubt Lake
Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System
Baranof Warm Springs FS Cabin, Lake and Trail; Sadie Lake and Trail
Moser Island FS Cabin; Adjacent Seal Rookery
Sitkoh Lake FS Cabin, Lake and Trail; Upper Sitkoh Bay and Tidelands; Sitkoh Lake
Sockeye Stream and Lake System
Goulding Lakes FS Cabin; Goulding Harbor, Trail and Lakes System
White Sulphur Hot Springs, FS Cabin, Lake and Trail; Mirror Harbor, Sea Level Slough;
Dry Pass Trail and Harbor

The large group enclaves proposed could be heavily used by up to seventy-five people at a time. Seven of these enclaves are located within Special Management Areas. The effects of large group use on each Special Management area will differ depending on the area:

Usk Bay Enclave #04-13. There is a large intertidal area in this SMA with concentrations of dunginess and king crab. The intertidal area and anchorage are widely used for recreational boating, camping and picnicking. Large groups at the upper end of the Bay will impact and conflict with users of the SMA. There is the potential for depletion of the crab if harvested as part of these commercial visits, whether permitted or not. The designation of this area as a large group enclave could conflict with users pursuing traditional activities such as hunting and fishing in the Bay per Enforceable Policy 3.1 of the SCMP.

Sitkoh Bay Rd Enclave #0413. The SMA consisting of Sitkoh Lake FS Cabins, Lake and Trail, Upper Sitkoh Bay and Tidelands and Sitkoh Lake Sockeye Stream and Lake System is a very important, heavily used recreation and subsistence area. It is also a highly productive estuarine system. Adjacent Florence Bay is a popular halibut fishing area. The area receives major public use and is an important bear habitat and transit area. The designation of this area as a large group enclave would adversely impact public use and resource values if this area is used partly because of the potential for conflict with recreational users and bear habitat per Enforceable Policy 3.1, and with subsistence users per Enforceable Policies 9.1 ("including cumulative impacts") and 9.3 of the SCMP.

Fish Bay 15% Enclave #0403. This enclave is located directly south of a SMA. This SMA is a popular destination in part because of the hot springs located at the end of the trail. This area is also heavily used for crabbing and shore activities. Group use should not impede access to the SMA and the hot springs per Enforceable Policy 3.1 of the SCMP. Groups should not interfere with users of the SMA and the hot springs nor adversely impact resources in the area.

Dry Pass Enclave #0403. This area has large concentrations of waterfowl and is heavily used by duck and deer hunters. It includes large, productive tidelands and unexcelled estuarine habitat. Public users should not be displaced by group use. Enforceable Policies 3.1, 9.1 and 9.3 of the

11/37

01-02-03 02:22pm From: DIV OF COORD 907 485 3075 T-641 P.010/037 F-170

DEC.10.2002 8:51PM SITKA COASTAL MNGT NO.259 P.8

Sandy Barhamuk
December 10, 2002
Page 7 of 10

Secluded Bay (Nooker Bay)/Benzanum Lake Sockeye Stream and Lake System
Brent's Beach FS Cabin and Kamanoi Beach
Head of Kretstuf Sound through Dry Pass; Road to Gilmer Bay
Nakwasina Islands
Nakwasina Passage to head of Nakwasina Sound
Lake Eva FS Cabin, Lake and Trail; Lake Eva Sockeye Stream and Lake System
Kelp Bay Basin and Pond Island
Kadashan Bay
Kook Lake FS Cabin, Lake and Trail; Basket Bay; Kook Lake Sockeye Stream and Lake System
Lisianski River, Lake and Trail
Sitkoh Island
Sitkoh Lake FS Cabins, Lake and Trail; Upper Sitkoh Bay and Tidelands; Sitkoh Lake Sockeye Stream and Lake System
Ford Arm Sockeye Stream and Lake System
Klag Bay Sockeye Stream and Lake System
Lake Anna Sockeye Stream and Lake System
Leo Anchorage Sockeye Stream and Lake System

SCMP Enforceable Policy 9.2 Pg. 96 states in part: "Razor clams on Kamanoi Beach...and black seaweed...are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts." This policy is particularly relevant to the Brent's Beach FS Cabin and Kamanoi Beach SMA, where razor clams are harvested, and Sitkoh Island SMA, where black seaweed is harvested. The scarcity of these resources makes their protection a high priority. Commercial group use must not compromise these resources.

SCMP Enforceable Policy 10.3 Pg. 139 is relevant to the Signaka Islands SMA where herring eggs are harvested. "Land and water uses having the potential to significantly adversely impact habitat seasonally supporting substantial concentrations of herring eggs, shall, to the extent feasible and prudent, be designed to conserve existing habitat or mitigate significant adverse impacts." Herring eggs are a particularly sensitive and traditional resource which must be preserved. Commercial group use must not be detrimental to the habitat which supports herring eggs and their harvest.

PUMP Enforceable Policy 1 Pg. 18 states: "Tideland uses shall be compatible with the recreation nature of the upland use at public cabin and trailhead Special Management Areas." PUMP Enforceable Policy 3 Pg. 18 states in part: "US Forest Service public use cabins shall be managed for recreation and conflicting uses not permitted..." It is understood in the DEIS that there will be no commercial use of these cabin sites for outfitter/guide camps. These Enforceable Policies enforce that prohibition. The following SMA's contain a cabin and/or trailhead adjacent to tidelands:

Kaga Bay FS Cabin
Sevenbottom Bay FS Cabin
Allan Point FS Cabin
Brent's Beach FS Cabin and Kamanoi Beach

10/37

Appendix G—Response to Comments

01-02-03 02:23pm From:DIV OF COORD 907 485 3075 T-441 P.012/037 F-170

DEC-10, 2002 01:32PM SITKA COASTAL MNGT NO. 259 P. 10

Sandy Hachamak
December 10, 2002
Page 9 of 10

SCMP are important in this area in regard to the access of and possible adverse impacts ("including cumulative impacts") upon recreational and subsistence users.

Eagle River Rd Enclave #0403. The Eagle River Road area is favored for coho fishing and receives extensive ATV use. Public users of the Eagle River area should not be displaced by group use. Enforceable Policies 3.1, 9.1 and 9.3 of the SCMP are important in this area in regard to the access of and possible adverse impacts ("including cumulative impacts") upon recreational and subsistence users.

Noxon (Nakvasina SMA) Enclave #0403. The Nakvasina SMA likely receives the most intensive recreational and subsistence hunting and fishing of any area in the Sitka District. The Use Area Card should reflect this intensive use. The designation of this area as a large group enclave is not appropriate because there is such a high possibility for conflicts between commercial groups and public recreational users per Enforceable Policy 3.1, as well as with subsistence users per Enforceable Policies 9.1 and 9.3 of the SCMP. By moving the large group area in Nakvasina further west, away from the major coho streams, deer hunting areas, good anchorages and major public use and uplands access areas, these conflicts could be reduced.

Lake Eva Trail Enclave #0404. This SMA is a highly valued subsistence and recreational area due to the good salt water anchorage, stream's significant runs of steelhead and sockeye and the large run of coho, the excellent access to the Lake on the boardwalk trail, and other assets. The trail is important for subsistence and recreational users to access the stream and lake. A 100' buffer strip should be maintained on each side of the trail per PUMP Enforceable Policy 5. The designation of this area as a large group enclave is probably inappropriate because of the potential for conflict with public recreational users per Enforceable Policy 3.1, as well as with subsistence users per Enforceable Policies 9.1 and 9.3 of the SCMP. There are already public concerns about commercial use of this area, which are likely to become much bigger issues with large group use.

Hams Bay/ Portage Arm Enclave #0404B. This area receives high recreation and subsistence use by campers, hikers, hunters and fishermen. The DEIS notes "some use" of the entire Kelp Bay area by residents of Sitka, Angoon and Warm Springs. This use is likely much broader than stated. Portage Arm has a large, productive estuary. There are major concentrations of crab, bear and waterfowl. The bay is an active fishing ground and heavily used anchorage. Having a large group enclave at the neck of Portage Arm seems ill advised. There is a high potential for conflict between public users and commercial groups. Public access will likely be impeded because public users land boats on the proposed enclave area and travel up Portage Arm. There is potential for conflict with public recreational users per Enforceable Policy 3.1. The proposed large group enclave should be located further away from this heavily used, sensitive habitat and portage area, preferably at the former LTF site which has already had major development impacts.

The above are only preliminary comments, based on a brief analysis of the presumably hundreds (thousands?) of pages in the DEIS. Much of the numerical analysis of this document is beyond my ability to meaningfully interpret. In order to determine consistency with the Alaska Coastal Management Program, specific project proposals for specific sites generating predictably

12/37

01-02-03 02:24pm From:DIV OF COORD 907 485 3075 T-441 P.012/037 F-170

DEC-10, 2002 01:32PM SITKA COASTAL MNGT NO. 259 P. 11

Sandy Hachamak
December 10, 2002
Page 10 of 10

specific impacts must be reviewed, and in general, these details are not available. Therefore, it is beyond my capacity to determine whether this DEIS is or is not consistent with the Coastal Management Program. It is likely that permitting commercial uses in at least some of the Sitka Coastal Program Special Management Areas would be inconsistent with the referenced Enforceable Policies. However, these can only be evaluated on a site-specific, policy-specific basis, and the impacts to both other users and to the environment of permitting various commercial operations in various locations may not be easily predictable except in hindsight. Therefore, it would appear wise to err on the side of caution when setting aside large tracts of lands as open to commercial activities, regardless of whether these areas already have special significance in their current state (e.g., the Special Management Areas).

We look forward to working with the Forest Service to resolve the concerns addressed in this comment letter and may submit a revised comment to the Forest Service prior to the January 3, 2003 deadline for comments on the DEIS. If there are any questions about this response, please feel free to call me at 747-1855. Thank you for the opportunity to comment.

Sincerely,


Madeline A. Campbell
Coastal Management Coordinator

Cc: Fred S. Salinas, USDA Forest Service
A.E. Zimmer, Administrator

13/37

01-02-03 02:24am From-DIV OF COORD T-441 P.014/037 F-170

DEC.10.2002 8:38PM SITKA COASTAL MNGT *NO. 203 P.12
SITKA COASTAL MNGT
1989*

2.2 POLICY:
No building permit shall be issued by the municipal building official in any area containing any geophysical hazard as defined herein or as defined in any other municipal law or ordinance until the remedies for such hazards have been incorporated into the project design documents.

3. RECREATION (6 AAC 80.060)

3.1 POLICY:
To the extent feasible and prudent, the following criteria shall be utilized in land and water management decision-making affecting areas widely used for recreational purposes including, but not limited to, those areas listed in policies 3.3 and 3.4:

- 1) Habitat and access shall be maintained for traditional activities including hunting, fishing, clamming, beach-combing, hiking, nature observation, and other recreational uses;
- 2) The visual and aesthetic characteristics of recreational areas shall be protected and maintained;
- 3) The proposed use of activity shall minimize adverse impacts on recreational uses.
- 4) Significant adverse effects upon the habitat or qualities upon which the recreation depends shall be avoided or mitigated.

3.2 POLICY:
Recreational access to public uplands, shorelines, tidelands, and wetlands shall be maintained and enforced to the maximum extent feasible and prudent, through easements, dedications, or other means, except where human health or safety would be at risk.

3.3 POLICY:
Recreation and/or preservation of the resource shall be considered the primary use of the following areas, regardless of ownership, and the areas shall be protected and developed for the enhancement of recreational use:

- 1) Sitka National Historical Park (federal government)
- 2) Pioneer Park (state government)
- 3) Moller Park (local government)
- 4) Crescent Park (local government)
- 5) Totem Square (state government)
- 6) Halibut Point Recreation Area (state government)
- 7) Sandy Beach (state government)
- 8) Starfigavan Campgrounds (federal government)
- 9) Old Sitka (state government)

134

14/37

01-02-03 02:24am From-DIV OF COORD T-441 P.015/037 F-170

DEC.10.2002 9:34PM SITKA COASTAL MNGT *SITKA COASTAL MNGT
1989*

- 10) Swan Lake A.M.S.A. (local government)
- 11) John Brown's Beach (federal government)
- 12) Mahkmati Island Causeway (state government)

3.4 POLICY:
Recreation and/or preservation of the resource shall be a high-priority use of the following heavily utilized areas within the City and Borough of Sitka, and to the extent feasible and prudent, the portions of these areas in the public domain shall be protected and maintained for recreational use:

- 1) Goddard Hot Springs (local government)
- 2) White Sulphur Springs (federal government)
- 3) publicly-owned portion of Baranof Warm Springs north of the river (local, state or federal government)
- 4) Mt. Edgecumbe National Recreation Trail (federal government)
- 5) U.S. Forest Service Cabin Sites and adjacent areas (federal government)
- 6) Other areas in the public domain may be added to this list through amendment to the SCMP.

4. ENERGY FACILITIES (6 AAC 80.070)

Electrical

4.1 POLICY:
The municipality identifies the Takatz Lake watershed for a proposed hydroelectric power site as the highest priority use for this site and shall oppose any other conflicting land use classification or proposed uses of the Takatz Lake watershed as long as this designation exists. Interim, non-conflicting uses for Takatz Lake may be permitted.

Fueling Facilities

4.2 POLICY:
Fueling facilities must be constructed to include a barrier or other safeguard to prevent any spill from entering coastal waterways or wetlands.

5. TRANSPORTATION AND UTILITIES (6 AAC 80.080)

5.1 POLICY:
Following construction, intertidal or beach areas must be cleaned and restored to acceptable aesthetic conditions.

135

15/37

Appendix G—Response to Comments

01-02-03 02:25pm From-DIV OF COORD T-441 P.017/037 F-170

DEC.10.2002 8:34PM SITKA COASTAL MNGT NO.255 DISTRICT COASTAL MNGT RECORD 1989

DEFINITION: Alaska Statute title 16, Section 16.05.940, Definitions:

"(23) subsistence uses means the noncommercial, customary and traditional uses of wild, renewable resources by a resident domiciled in a rural area of the state for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation, for the making and selling of handicraft articles out of nonedible by-products of fish and wildlife resources taken for personal or family consumption, and for the customary trade, barter, or sharing for personal or family consumption; in this paragraph, family means persons related by blood, marriage, or adoption, and a person living in the household on a permanent basis."

Enforceable Policies

9.1 POLICY: Land and water uses and activities within the District shall minimize and/or mitigate significant adverse impacts, including cumulative impacts, on subsistence resources and their use. If a substantial concentration of the resource could be significantly adversely impacted by a proposed use or activity, protection of the resource shall be a priority consideration. Important subsistence resources include: razor clams, black and pink seaweeds, salmon (especially sockeye), halibut, deer, herring, eggs, smelt, rockfish, abalone, crab, shrimp, mussels, gumboots, goat, bear, ducks and other waterfowl, berries, fur bearers, sea otters, and seals.

9.2 POLICY: Razor clams on Kamenoi Beach (the only known major concentration in the District) and black seaweed (available at only a few privately known locations in the District) are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts to the resource.

9.3 POLICY: Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law.

96

16/37

01-02-03 02:25pm From-DIV OF COORD T-441 P.017/037 F-170

DEC.10.2002 8:34PM SITKA COASTAL MNGT

NO.255 DISTRICT COASTAL MNGT RECORD 1989

9.2 POLICY:

Razor clams on Kamenoi Beach (the only known major concentration in the District) and black seaweed (available at only a few privately known locations in the District) are unique because of their scarcity and the potential for total loss of the resource at these sites, and shall be protected from significant adverse impacts to the resource.

9.3 POLICY:

Persons engaged in subsistence activities shall have access to subsistence resources on public lands and waters to the full extent provided under relevant law.

10. HABITAT (6 AAC 80.130)

10.1 POLICY:

To maintain anadromous and resident fish populations and associated wildlife, land and water uses potentially affecting anadromous fish streams will be designed to conserve or improve existing habitat or mitigate adverse impacts. To prevent unnecessary encroachment upon these stream channels, their banks, and associated floodplains, new construction and land clearing shall, where feasible and prudent, be buffered by a natural vegetation zone within a minimum of 25 feet along either side of the 100-year floodplain. A wider buffer is encouraged where appropriate to provide greater protection.

10.2 POLICY:

Areas already industrialized, such as Sitka Channel, Sewall Cove, and Jamestown Bay, shall be given priority for siting future water-dependent commercial and industrial development, since industrialized areas generally have low fish and wildlife resources and habitat values and will be less adversely impacted by development than would non-industrialized areas.

10.3 POLICY:

Land and water uses having the potential to significantly adversely impact habitat seasonally supporting substantial concentrations of herring eggs, shall, to the extent feasible and prudent, be designed to conserve existing habitat or mitigate significant adverse impacts.

139

17/37

01-02-93	02:25pm	From-DIV OF COORD	T-441	P.019/037	F-170
DEC.10.2002	8:55PM	SITKA COASTAL MNGT	NO.259	P.17	
<p>1. Where feasible and prudent, a minimum "no development" buffer of 100 feet shall be maintained on each side of the stream or each sockeye stream as well as the entire lake to 200 feet from the lakeshore landward, in order to protect the sockeye resource. If a stream-by-stream review is conducted by the Alaska Department of Fish and Game, the buffer, which also establishes the boundary of the Special Management Area, may be adjusted to protect and perpetuate both the passage and spawning areas on these sockeye streams, through an Alaska Coastal Management Program amendment process.</p> <p>2. U.S. Forest Service public use cabins shall be managed for recreation and conflicting uses not permitted, within a Special Management Area boundary of 200 feet around the cabin. When located on a lake, this boundary shall include the entire lake and a 200 foot buffer strip around the lakeshore.</p> <p>3. Floating facilities shall be prohibited within the boundaries of Special Management Areas except for the maintenance of the recreation and/or subsistence resources within the Special Management Areas. Exceptions to this policy may be made only after a consistency review or other public process determines that there is greater public benefit by permitting a use (e.g., temporary moorage of a fish buying acow) in a Special Management Area than the public benefit accrued by protecting that Special Management Area exclusively for recreation and/or subsistence uses. Existing leases and special use permits within the Special Management Areas are exempted from these policies. If the lease or permit is renewed or the project is modified, it would then become subject to the policies in this Plan.</p> <p>4. Where feasible and prudent, a "buffer strip" of 100 feet shall be maintained on each side of all trails listed as Special Management Areas, for the protection of the trail and the recreational experience. If it would be necessary to cause a significant adverse impact to the trail, the trail should be relocated where the buffer can be maintained. Where feasible and prudent, all viewpoints, scenic areas, and other unique recreational features of the trail shall be protected.</p>					
<p>5. Where feasible and prudent, all land- and water-based uses which conflict with the management of the Special Management Areas shall be prohibited. These uses include, but are not limited to, structures (temporary or permanent) except for public use facilities; beach or water storage of logs or equipment; mariculture/aquaculture facilities of any type, including temporary uses such as for short term, temporary floating facilities, other Policy 4. This policy does not use as described under Policy 4. This policy does not preclude the development of fish enhancement projects when a need is shown and proper evaluation, existing leases and public process, has been completed. Existing leases and special use permits within the Special Management Areas are exempted from these policies. If the lease or permit is renewed or the project is modified, it would then become subject to the policies in this Plan.</p> <p>6. New transportation facilities are exempted from all other enforceable policies contained in this Chapter, but must meet the criteria described below. Existing transportation facilities are exempted from all enforceable policies and are not restricted as to repair or modifications. Transportation facilities include, but are not limited to, log transfer facilities (LTF), log storage areas associated with LTF's, and road construction within or across a Special Management Area. This policy does not preclude management of the Tongass National Forest by restricting facilities that are required to manage the uplands in a manner consistent with the land use designation for the area.</p> <p>Criteria to be used in the consideration of siting of new transportation facilities are:</p> <ol style="list-style-type: none"> Where feasible and prudent, transportation facilities shall be located outside Special Management Areas. If it is necessary to locate a transportation facility within a Special Management Area, the immediate vicinity of identified Special Management Area recreation sites (such as cabins, popular camping or picnic areas, and streams commonly used for recreational and subsistence fishing) shall be avoided. Log storage sites associated with the LTFs will be kept to the minimum size needed to serve the LTF. Logs will be removed to alternate sites outside the Special Management Area as soon as practical. Facilities within a Special Management Area shall be kept to the minimum area necessary to provide for safe operation of the facility. A need must be shown and proper evaluation, including a formal public process, must be completed. 					

Appendix G—Response to Comments

01-02-03 02:25pm From:DIV OF COORD T-441 P.021/037 F-170

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME
DIVISION OF WILDLIFE CONSERVATION

FRANK H. MURKOWSKI,
GOVERNOR

P.O. BOX 20056
JUNEAU, AK 99802-5528
TELEPHONE (907) 465-4100
FAC (907) 465-2332

MEMORANDUM

TO: Sandy Harbomuk
Project Review Coordinator DGC

FROM: Tom Paul
Program Coordinator - ADFG/DWC

DATE: December 16, 2002

SUBJECT: Shoreline Outfitter/Guide DEIS (Guided Recreation)

The Alaska Dept. of Fish and Game (ADFG) has reviewed the Shoreline Outfitter/Guide Draft Environmental Impact Statement (DEIS) for commercial outfitting and guiding activities on the shoreline of the Tongass National Forest (TNF) in northern Southeast Alaska. The following are consolidated comments from the divisions of Habitat and Restoration, Sport Fish, and Wildlife Conservation. The Division of Wildlife Conservation (DWC) was an active member of the Unit 4 Brown Bear Management Team (BBMT), a stakeholder agency and citizens' advisory team which contributed a significant number of scoping comments to this National Environmental Policy Act (NEPA) process. In addition to these comments the DWC includes by reference any additional comments submitted to the Forest Service (FS) by the BBMT.

The analysis area for this project includes approximately 7,018,700 acres of the Admiralty Island National Monument, and the Hoonah, Sitka, and Juneau Ranger Districts. The shoreline zone of the analysis area extends one-half mile inland from mean high tide, and includes approximately 5300 miles of shoreline. Eleven communities are within the analysis area: Juneau, Sitka, Port Alexander, Tenakee Springs, Pelican, Elfin Cove, Gustavus, Angoon, Hoonah, Haines and Skagway. Two areas on Admiralty Island are excluded in the DEIS: Mitchell Bay and environs, the Pack Creek Zoological Area. The national forest shorelines associated with the Juneau and Sitka road systems are also not included.

The project is intended to determine the amount of carrying capacity allocated to commercial use, specify the types of commercial recreation activities permitted, specify methods of access approved for commercial use, specify the types and locations of areas where large groups can occur and under what conditions, specify mitigation measure for commercial recreation activities, and establish monitoring requirements. Five alternatives are analyzed in the DEIS,

20/37

01-02-03 02:25pm From:DIV OF COORD T-441 P.021/037 F-170

12/10/02

ADF&G comments
Shoreline Outfitter/Guide DEIS

2

with Alternative 1 the no action alternative, Alternative 2 the proposed action, and Alternative 5 the preferred alternative.

General comments
The Shoreline Outfitter/Guide EIS is a much needed and welcome document that will direct FS management of commercial outfitter/guides for the foreseeable future. Because of its importance a high quality document is essential. In general this DEIS has good descriptions of the resources and characteristics of the Use Areas including maps with good detail and descriptions. We find, however, that the positive aspects of the document are outweighed by major flaws related to its scope, the scale of analysis, vagueness on coordination with state planning, little opportunity for public involvement in the carrying capacity analysis driving the DEIS allocations, the lack of explanation or rationale for some important assumptions and decisions, and the weakness of proposed mitigation and monitoring actions.

One particular disappointment is that the DEIS does not meaningfully address the major recommendations of the Unit 4 Brown Bear Management Team. The team had representatives of a broad cross-section of interest groups including brown bear guides, wilderness-recreation and conventional tourism industries, environmentalists, resident hunters, small communities, Native corporations, non-hunting recreationists, and subsistence users, as well as ADF&G, the Alaska Board of Game, and the FS. The diversity of this stakeholder group and its ability to come to consensus on many brown management issues is particularly noteworthy and valuable. The FS strongly supported the team throughout its tenure and its failure to use the opportunity of this EIS to seriously consider and implement the team's recommendations, particularly those dealing with the limits on guided brown bear hunts and guides and on designation of human bear high use zones, is a surprise and a major disappointment.

Geographical Scale of Analysis
The project area is subdivided into thirty-eight different Use Areas based on already existing ADF&G hunting guide use areas. Thirty-seven of these contain a shoreline zone and are included in this analysis. The correspondence between the DEIS Use Areas and ADF&G guide use areas is appropriate in general. It would be more appropriate if the DEIS had allocated use to types of guide/outfitters including hunting guides, instead of lumping all commercial use together in one allocation (see Scope section below).

In some circumstances however, the DEIS Use Areas are too large and not specific enough. The Forest Service has stated in the "Shoreline Recreation Carrying Capacity" analysis document (SRCC) 2001 that "Much of the land in the analysis area is functionally unsuitable for onshore recreation because of impenetrable vegetation, steep or water saturated terrain, or the cost of reaching remote areas. The majority of the coastline is rugged and rocky, so easy access by boat is limited primarily to protected bays and beaches. Many of these recreation places were inventoried in the Forest Plan. We assessed where boats could come ashore and where groups could reasonably recreate, given the local topography within each Use area".

The BBMT noted this problem in its scoping comments, recommending that "Areas meriting special attention" within the use areas be identified and managed on a smaller scale. In the DEIS the FS does not appear to have explained its apparent assumptions that 1) users will spread out

21/37

12/10/02

12/10/02

ADF&G comments Shoreline Outfitter/Guide DEIS

ADF&G comments Shoreline Outfitter/Guide DEIS

also extend the moratoria until the other process has made the "permanent" allocations. The Alaska Board of Game also urged that the FS describe its process and continue the moratoria in a resolution passed unanimously at its Nov. 7, 2002 meeting (see attachment).

Assessment of the effects of DEIS alternatives on sport fisheries is also hampered because use areas identified in the DEIS encompass multiple watersheds and fisheries. Bays, beaches and streams will be managed in the aggregate without consideration for the proportion of permitted use or type of use that they will attract individually. Some popular streams that currently receive a relatively high level of guided effort have been assigned independent mitigation in the DEIS. However this strategy does not seem to have been applied to all management areas that contain a number of sport fishing streams. As is, the DEIS does not effectively manage use from a fisheries standpoint.

Because allocation between types of commercial activity was not addressed and multiple streams are treated in the aggregate, it is difficult to identify where and to what degree future restrictions in the sport fishery may be needed. Independent of the distribution of use and type of use, or the proposed action decided upon in this DEIS, the Alaska Department of Fish and Game will manage fish stocks for sustained yield by restricting harvest limits or methods and means when and where necessary. Where sport fishing effort under existing regulations puts stocks at risk, harvest limits and/or methods and means will be restricted by emergency order. Similarly, it is difficult to determine the effect this will have on the diversity of sport fishing opportunity in SE Alaska.

Coordination with state planning

The DEIS lacks detail as to how the FS has assured its shoreline carrying capacity allocations are compatible with the state's parallel planning process for state lands in the same area, the Northern Southeast Area Plan (NSAP). The Habitat and Restoration Division was actively involved with the NSAP. This document was created by the Alaska Department of Natural Resources and has gone through draft and final review processes. The final document will be available in summer 2003. The NSAP determined management intent, land-use designations, and management guidelines that apply to all state lands in the planning area. This includes submerged lands, tidelands, uplands and shorelands managed by the state. Tidelands span the areas from mean high water to mean lower low water, submerged lands reach from mean lower low water to a line three miles seaward from mean lower low water. Shorelands include the lands below ordinary high water in non-tidal areas. Tidelands are the major source of access into the NF for most guided operations.

Considerable effort has been expended in the plan preparation process of the NSAP. The FS was closely involved in the planning process along with local governments, conservation groups and native governments. Tidelands polygons and Tideland Management Resource Zones (TMRZ) were developed through this plan. Land-use designations have been applied to the tideland polygons and TMRZ. A land-use designation recognizes uses or resources that are of major importance in a particular management unit. Unit designations are based on current and projected future use patterns and the most significant resources identified in each unit.

23/37

3

naturally throughout the Use Areas, 2) that these users will apparently be satisfied to spread out to avoid other users, and 3) that all areas in a [Use Area] will support the same quality of experience. In addition, the monitoring plan does not appear to include the testing of planning assumptions and the opportunity to make year-to-year adjustments in the FS shoreline use allocations resulting from this EIS.

The Final EIS needs to identify Use Areas where activity will likely concentrate at focal points such as inventoried recreational places (protected bays and beaches) and clearly explain how proposed use levels will affect these smaller areas. It should also include a plan for monitoring the effects of the EIS use allocations and a mechanism for changing the allocations if necessary.

Scope of DEIS

The scope of the DEIS too limited. The DEIS allocates use between commercial and non-commercial sectors but stops short of allocating use among the various types of commercial activities. This limitation inhibits an assessment of the effects of individual types of commercial and non-commercial activity (such as sport fishing, bear hunting, etc.) on an area's resources and users. The level of compatibility of uses also cannot be addressed, nor can an assessment be made of what effect allocations to one use have on other uses.

The alternatives provide a broad range of options, all of which allow for growth in commercial activities. However, the level of use for specific type of permitted commercial activity was not addressed. Although all alternatives allow for growth, it remains unknown what types of commercial activities will be permitted in areas and how that allocation will be determined. Since this aspect was not addressed in the analysis, possibilities include growth in all types of commercial activities, growth in some but not others, or growth in some but reductions in others. The DEIS gives no guidance to District Rangers or other managers for allocating between types of use when it comes time to issue specific permits. Furthermore, it appears that the DEIS did not recognize that growth in commercial guiding for brown bears may be unwise and is NOT supported by a broad group of stakeholders, including big game guides, wildlife watchers, conservation groups, etc. (i.e. the Unit 4 BBMT). If it is the intent of the FS to suggest growth in this commercial sector, the FS needs to present additional information to justify that.

Deferring allocation between types of use to some future undefined process is extremely disappointing to the department which was led to believe that this EIS process would be the one to make specific allocations to guided bear hunting if not other types of guiding. For a number of years it has been clear that FS limits on the number of guided bear hunts it permits would be the most effective way to help meet ADF&G brown bear harvest guidelines in Units 1 and 4 while ensuring a viable brown bear hunting guide industry in the area. Although acknowledging that, the FS has said it could not limit the number of guided bear hunts it permits without a public NEPA process to determine appropriate levels. Until recently, the Shoreline Outfitter/Guide EIS process was designed to be the mechanism for setting those levels. Indeed, temporary moratoria on increasing brown bear hunting guide permits and hunt numbers issued in Units 1 and 4 were to be ended upon completion of this EIS process. These moratoria are set to expire with the completion of this EIS process (DEIS, Chapter 3, pg. 113). If the FS is determined not to include allocation levels for guided bear hunts in the EIS, then we ask the FS to specifically describe in the FEIS, or in an attached appendix, the kind of process to be used to make those allocations, the timeline for that process, and what plans it has for public and agency involvement. It should

22/37

Appendix G—Response to Comments

01-32-43 02:28pm From:JIV OF COORD T-441 P.025/337 F-170

12/10/02

6

ADF&G comments
Shoreline Outfitter/Guide DEIS

We ask that the FEIS clearly explain the rationale behind the proposed prohibitions and restrictions.

Restrictions on fishing in use areas, such as 04-01A, 04-02A, and 04-03 under alternatives 2, 3, 4, and 5, appear to be taken to mitigate some impact to the resource. In most or all cases, these measures are not necessary for the conservation of fish populations. We agree with the statement: "current and future fishing effort by guided freshwater sport fishing represents a minimal fraction of total harvest in the analysis area and surrounding salt waters". For that reason, and through the authorities of the Board of Fisheries and the Federal Subsistence Board, conservation of fish populations will be maintained regardless of restrictions to guided sport fishing imposed through this effort.

Mitigation

We are pleased the mitigation section of the DEIS includes many recommendations and guidelines from the Unit 4 BBMT. However, in some cases it is not clear how the mitigation measures will be implemented. For instance, the BBMT concept of "Human/bear high use zones" is included in the DEIS, but no practical steps necessary to implement the concept are included. Key to implementing the tiered mitigation measures in high use zones is the need for inventorying areas likely to qualify, evaluating whether the areas merit designation, and monitoring activity in the areas over time in order to determine when mitigation measures are required. The DEIS proposes no link between this mitigation and monitoring and indeed the DEIS monitoring section has not proposed the monitoring necessary to effectively implement the high use zone mitigation measures.

In addition, although the DEIS on page 11, Appendix C seems to accept the BBMT recommendation that Lake Eva estuary, Mud Bay, and Trail River (Idaho Inlet) estuaries are Tier 1 high use zones in which airplane, ATV, jet boat, and helicopter access should be prohibited, only the Appendix A Use Area Cards for Lake Eva includes this prohibition as mitigation and only airplane access is mentioned. Airplane access to Mud Bay is permitted, contradicting the statement in Appendix C and the recommendation of the BBMT. Motorized watercraft restrictions at Mud Bay and Trail River are only to be imposed if adverse effects to fish habitat are determined. Unacceptable disturbance to bears and other wildlife should also be grounds for restrictions in our view. Other Tier 1 restrictions on camping near salmon streams, campfires, barbecues, etc. are not mentioned on the use area cards.

These contradictions and deficiencies should be remedied and a formal commitment to evaluation and monitoring of human/bear high use zones should be included in the FEIS. Without such concrete measures we are afraid this portion of the mitigation plan will be mere window dressing and ineffective.

Monitoring

Proposed monitoring is inadequate to evaluate the effectiveness of this action. The stated objective of project monitoring (Appendix D, p. 3) is to: "provide a quality recreation experience..." To do so requires quantitative analysis of preferences among all users - commercial and non-commercial - affected by this analysis. Efforts currently identified in the monitoring plan include anecdotal, subjective and non-scientific tasks, many involving public

25/37

01-32-43 02:27pm From:JIV OF COORD T-441 P.024/337 F-170

12/10/02

5

ADF&G comments
Shoreline Outfitter/Guide DEIS

A significant portion of the tideland polygons and all of the TMRZ are designated habitat. This designation applies to areas of varied size for fish and wildlife species during a sensitive life-history stage where alteration of the habitat or human disturbance could result in a permanent loss of a population or sustained yield of a species. Timing restrictions for these tideland polygons and TMRZ areas should be incorporated into the Use Areas of the Shoreline Outfitter/Guide DEIS so the resources found there can be protected i.e. waterfowl/shorebird concentration areas, herring spawning areas, sea lion/harbor seal haul-outs, etc.

The DEIS does not make note of the habitat designation on state lands and so raises the question of whether or not the proposed use allocations take this designation into account. No timing restrictions for commercial use are proposed in the DEIS for any areas. The FS is familiar with the NSAP and the FEIS should acknowledge the state designations on lands adjacent to FS lands and incorporate NSAP site-specific information and timing restrictions where appropriate to make the EIS and NSAP as compatible as is feasible. NEPA requires the FS to consider cumulative actions, which when viewed with the proposed action have cumulatively significant impacts on the human environment (see 40 C.F.R. 1508.25 (a)(2)).

Recreation Carrying Capacity Analysis

The "Shoreline Recreation Carrying Capacity" analysis (SRCC) done by the FS in 2001 preparatory to producing the DEIS had too little public involvement in our view. The results of the SRCC appear to drive all the allocations in DEIS and yet, because the carrying capacities of areas were unilaterally determined by the FS in a separate document, the public and other agencies are not able to analyze or critique those carrying capacities. Furthermore the method for determining social carrying capacity as described in the DEIS Appendix F is based on a one-size-fits-all formula matching TLMP ROS class encounter levels to all Use Areas of the analysis area with no regard for the individual characteristics of the Use Areas. More appropriate in our view is a method employing user surveys to determine the carrying capacities by gauging the public's "limits of acceptable change" for each area. Such surveys should be used in a formal monitoring program used in field verifying the appropriateness of EIS allocations (see Monitoring section below).

Rationale for prohibitions and restrictions on guided sport fishing
Prohibitions and restrictions on guided sport fishing specifically proposed under alternatives appear arbitrary and are unnecessary for conservation reasons. The analysis explicitly refrained from allocating use between types of commercial activity but then specifically restricted guided sport fishing use in a number of areas as mitigation measures under specific alternatives, i.e. 04-03, alternatives 2, 3 and 5. Although these restrictions are posed specifically for one type of commercial activity (sport fishing) use type, criteria applied to decide where and why were not identified or discussed in the analysis. The analysis implies that past fishery restrictions and the presence of subsistence fishing activity may have been factors in the decision but fails to identify whether other factors such as user preferences and current stock status were included in the decision. Additionally, how these factors were used in the analysis is absent. Without these parameters explicitly discussed, it appears the measures were arbitrarily imposed on guided sport fishing use. Consequences and the appropriateness of these measures, with respect to guided and non-guided sport fishing and other commercial uses, cannot be assessed without these criteria.

24/37

Response to Comments—Appendix G

01-02-03 02:25pm From-DIV OF COORD

807 465 3075

T-641 P.027/037 F-170

7

12/10/02

ADF&G comments
Shoreline Outfitter/Guide DEIS

comments. Scientifically defensible tasks, such as user preference surveys designed to collect statistically valid comments, should be included.

The Fish, Wildlife, and Subsistence Resources monitoring section (Appendix D, p. 5) is inadequate. Although the objective mentions non-consumptive uses, only consumptive use is addressed in the method and action. Two of the actions mentioned are adjusting seasons and bag limits which are not under the authority of the Forest Service. Monitoring of fish and wildlife needs to include more than simply reviewing harvest and use records. Areas need to be visited periodically, and systematically and use monitored to determine not only harvest affects but to evaluate disturbance effects on wildlife and habitat.

An example for such an evaluation and monitoring program already exists. In summer 2002, ADF&G and the Forest Service cooperated on a summer-long field evaluation of brown bear and human activity at Lake Eva estuary. The report and recommendations from that study are due in early 2003. Preliminary indications are that Lake Eva may not be as desirable a location for enclave designation as earlier believed. Although we are not recommending a change in Lake Eva's status at this stage, the point is that most areas have had little formal field evaluation of their suitability for various levels or types of commercial use. A commitment to formal evaluation of all sites over time should be a part of the monitoring plan of this EIS. Also, a method (preferably including public and agency involvement) needs to be identified for changing the allocations for areas should the monitoring program indicate that need.

Specific Comments

Chapter 3 Environment and Effects -

Page 85 reference to Katzebin River contains productive run of chum salmon. This system also provides important spawning and rearing habitat for coho salmon and Dolly Varden.

Page 122 states "No restrictions on the main stems of large glacial streams within the analysis area would be necessary because salmon are unlikely to spawn there." This assumption is false. Salmon do spawn in the main stems of glacial rivers. For instance, the main stem of the Chilkat River supports a very large spawning population of chum salmon. In addition, large glacial streams often provide valuable rearing habitat for chinook and coho salmon. Guided activities on large glacial streams need to be monitored to document negative impacts to spawning and rearing habitat.

Thanks for the opportunity to comment.

26/37

01-02-03 02:25pm From-DIV OF COORD

807 465 3075

T-641 P.027/037 F-170

IDF&G /WC JUNERU

ID:907-465-6142

DEC 17 '02

10:35 NO.VUL P.02

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

DEPARTMENT OF FISH AND GAME
DIVISION OF ADMINISTRATION
BOARDS SUPPORT SECTION

P.O. BOX 85326
JUNEAU, ALASKA 99802-85326
PHONE: (907) 465-4110
FAX: (907) 465-4004

Denny Bachor
Regional Forester
U. S. D. A., Forest Service
PO Box 21628
Juneau, Alaska 99802

November 22, 2002

Dear Mr. Bachor,

The Alaska Board of Game met recently and discussed the moratorium on new guiding permits for guiding brown bear hunts in Game Management Unit 4. The board adopted the enclosed resolution urging the continuation of the moratorium.

Please don't hesitate to let me know if I can be of further help. Thank you for your consideration of the Board of Game's request.

Sincerely,



Jim Marcotte
Acting Executive Director, Board of Game
Alaska Dept. of Fish and Game
1300 College Road
Fairbanks, Alaska 99701
907-459-7215

Cc: Ms. Wini Kessler, Director WFEW, Forest Service
Board of Game members
Wayne Regelin, Director, Wildlife Conservation
Kim Titus, Regional Supervisor, Wildlife Conservation
Board of Game members

Serving the Alaska Board of Fisheries and Alaska Board of Game

Printed on recycled paper by 1

27/37

Appendix G—Response to Comments

01-02-03 02:28pm From:DIV OF C0080 T-441 P.028/037 F-170
907 485 3075 DEC 17'02 10:36 NO.001 F.03
Df&g /UC JUNEAU ID:907-465-6142

Alaska Board of Game Resolution Request to the U.S. Forest Service Regarding Management of Guided Brown Bear Hunting in Unit 4

Whereas, the Board of Game has since the early 1980s heard testimony from the public and from management agencies concerning user conflict and potential over-harvest or displacement of brown bears in Unit 4; and

Whereas, in 1995 the Board of Game responded to these concerns by establishing a "Southeast Alaska Brown Bear Committee" to review the situation; and

Whereas, this committee reported to the Board of Game that year that the best solutions to two central problems — the proliferation of bear hunting guides and capping harvest — were outside state control, and that the U.S. Forest Service, whose authority did allow direct control of guide numbers and guide-by-guide allocation of harvest, was not intended to exercise control without a National Environmental Protection Act (NEPA) process; and

Whereas, the Brown Bear Committee, as a result, disbanded without effecting significant change in the status quo; and

Whereas, at the Board of Game fall 1998 meeting, testimony from the U.S. Forest Service that a NEPA process was now under way to establish a framework for controlling guide and guided hunt numbers and other related actions in collaboration with the Alaska Dept. of Fish and Game; and

Whereas, this testimony from the U.S. Forest Service, and a number of proposals illustrating continued public concern over several aspects of brown bear management centering on Unit 4, prompted the Board of Game to establish a "Unit 4 Brown Bear Management Team (BBMT)" comprised of two board members, a broad array of public interests, as well as U.S. Forest Service and Alaska Dept. of Fish and Game representatives; and

Whereas, this team, after two years of deliberation, produced by consensus a "Management Strategy for Brown Bear Management in Unit 4" which was unanimously accepted by the Board of Game at their fall 2000 meeting; and

Whereas, this document again flagged the proliferation of guides and hunt allocation as very important concerns; and

Whereas, the U.S. Forest Service responded in August 2000, by placing a moratorium of issuance of new bear guiding permits for Unit 4 (and Unit 1), pending outcome of the NEPA process intended to deal with these matters; and

1

28/37

01-02-03 02:28pm From:DIV OF C0080 T-441 P.029/037 F-170
907 485 3075 DEC 17'02 10:36 NO.001 F.04
Df&g /UC JUNEAU ID:907-465-6142

Whereas, the U.S. Forest Service decided during the NEPA process to defer consideration of matters related to brown bear hunting; as a consequence, the draft "Shoreline Outfitter/Guide EIS" produced in July 2002, failed to address these issues; and

Whereas, the U.S. Forest Service has recently stated its intent to deal with issues related to guided brown bear hunting in an additional, unspecified process once the NEPA process is final.

Now be it resolved that the U.S. Forest Service is respectfully requested

- to maintain the moratorium on new guiding permits until the additional process addressing guided brown bear hunting is in place and has reached appropriate decisions; and
- to describe the process and timeline envisioned for arriving at and implementing a policy on matter related to brown bear hunting, including plans the U.S. Forest Service may have for public and other agency involvement.

Vote: 6/0
November 7, 2002
Juneau, Alaska


Ben Grussendorf, Chair
Alaska Board of Game

2

29/37

01-02-03 02:30pm From: DIV OF COORD T-441 P. 031/037 F-170

CITY OF PORT ALEXANDER


P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2207

7 December 2002

Dear People,

The enclosed resolution was passed unanimously at our last council meeting. Please consider the information in your deliberations over the U S Forest Service shore line/ outfitter DEIS.

Thank you,


David Wallen, mayor

02 DEC 17 AM 9:36
CITY OF PORT ALEXANDER
DIVISION OF
COOPERATION

30/37

01-02-03 02:30pm From: DIV OF COORD

907 465 3075

T-441 P. 031/037 F-170

CITY OF PORT ALEXANDER

P.O. Box 8068 Port Alexander, AK 99836 907/568-2211 Fax 907-568-2207

02 DEC 17 AM 9:36

Resolution 02-16

Pertaining to The U S Forest Service
Shoreline Outfitter Proposal

WHEREAS: The U S Forest Service proposes allocating shoreline access to seven guided and unguided user groups in the seven bays of southeastern Baranoff Island including Deep, Herbert, Walter, Lucy, Conclusion/Armstrong, Port Alexander and Larch; and

WHEREAS: Four of the above listed bays have multiple unguided user groups permanently located within their geographical areas who, on a routine basis, utilize the upland areas from Patterson Bay south to Larch and even on north to Redfish Bay for a variety of purposes including subsistence hunting and gathering, recreational hiking and camping, and sport fishing; and

WHEREAS: There exist in Port Alexander several lodges and businesses catering to the commercial tourist industry who on a daily basis utilize the region from Patterson Bay to Larch Bay for purposes of 1) guided sport saltwater fishing with the extension of these groups into the shoreline zones for purposes of hiking and local exploration; 2) guided "fly in" freshwater fishing to some sites that are within the one half mile designated zone; 3) guided hunting groups in both the small and large game classification; and 4) guided walking tours of both an exploratory and educational nature; and that these groups can totally consume the guided commercial allocation for the region in even the most generous alternative for the commercial sector.

THEREFORE, BE IT RESOLVED THAT: The council for the city of Port Alexander requests that the U S Forest Service strongly consider the southeastern Baranoff Island designated zone as an area significantly utilized by the local residents and the tourist industry currently in existence in Port Alexander.

FURTHERMORE: That the local residents residing in Mist Cove during the entire salmon migration period, and on a year round basis in Little Port Walter, Port Armstrong, Port Conclusion and Port Alexander utilize Deep Bay

31/37

Appendix G—Response to Comments

01-02-03 02:30pm From: DIV OF COORD T-441 P. 032/037 P-170

for subsistence shrimp fishing and hunting especially at the head of the bay; Mist Cove for subsistence salt water fishing and hunting; Port Herbert for subsistence salt and freshwater fishing, and hunting especially at the head of the bay and in the stream drainage at the northwest end; Port Walter for subsistence salt and freshwater fishing in Sashin Creek and Lake and the other lakes and drainages in both Little and Big Port Walter, and hunting, shrimping, and subsistence clam digging especially at the site called Clam Island; hunting in Port Lucy and hiking specifically across the isthmus to Puffin Bay; Port Armstrong for subsistence saltwater fishing and beach asparagus collection, and freshwater fishing in Betty and Jetty Lakes and subsistence hunting; Port Conclusion for hunting, subsistence crabbing and shrimping, hiking and camping, and almost the entire Port Alexander community's beach asparagus collection at Ship's Cove; and south of Port Alexander and around to Larch Bay is utilized for a significant amount of hunting and recreational hiking and camping.

FURTHERMORE; That a one mile perimeter around Port Alexander for guided hunting for Brown Bear is a totally inadequate buffer zone against the potential range of wounded bears (escaping shot bears estimated by ADF&G and professional guides to range between 1 in 4 and 1 in 7) and that this buffer zone should be extended to 3 miles around all permanent sites of human habitation; and

FURTHERMORE; That the council for the city of Port Alexander has a long history of opposition to extensive especially external tourism documented through resolutions, ordinances and our comprehensive plan; that the local commercial tourist industry fully utilizes the commercial allocation under any of the proposed alternatives; and that there is a strong interest in not allowing the displacement of the private noncommercial user groups from their habitual and usual subsistence areas and purposes.

ADOPTED this 2nd day of December, 2002, at a Port Alexander City council meeting;

ATTEST:

P. Patricia Garnick
Patricia Garnick, city clerk

David D Wallen
David D Wallen, mayor

32 / 37

01-02-03 02:31pm From: DIV OF COORD T-441 P. 034/037 P-170



December 10, 2002
Division of Governmental Coordination
P.O.B. 110030
240 Main Street, Suite, 500
Juneau, Alaska 99811-0030
Attn: Sandy Harbanuk

Dear Ms. Harbanuk,

The City of Pelican supports the Preferred Alternative (Alternative 5) with regards to Bohemia Basin.

Pelican's Coastal Management Plan states:
"Bohemia Basin is outside the City limits, but falls within the region identified in the Pelican Coastal Management Plan as the Study Area. The region surrounding the Pelican Coastal Management District is an integral part of the economy and lifestyle of the City's residents. What happens in the surrounding region can greatly affect the City of Pelican, and it is in the City's interest to be concerned with external events and exert influence when vital, categorical issues arise outside the District boundary."

Pelican Coastal Management Plan Enforceable Policy 3.1

"Recreation areas designated in the PCMP shall be protected for recreational purposes and developed for the enhancement of recreational uses."

"The West Chichagof-Yakobi Island Wilderness Area...has significant recreational value to the community."

The above policy is in line with State standard 6 AAC 80.060. RECREATION.
(a) Districts shall designate areas for recreational use. Criteria for designation of areas of recreational use are

- (1) the area receives significant use by persons engaging in recreational pursuits or is a major tourist destination, or
 - (2) the area has potential for high quality recreational use because of physical, biological, or cultural features.
- (b) Districts and state agencies shall give high priority to maintaining and, where appropriate, increasing public access to coastal water.

34 / 37

OFFICE OF THE MAYOR • PUBLIC WORKS DEPARTMENT • PELICAN HEALTH CLINIC • PELICAN VOLUNTEER FIRE DEPARTMENT

Response to Comments—Appendix G

01-02-03

02:31pm From-DIV OF COORD

807 465 3075

T-441 P.036/037 F-170

01-02-03

02:31pm From-DIV OF COORD

807 465 3075

T-441 P.036/037 F-170

The wish and intent of the City of Pelican is to allow Bohemia Basin to be used as a recreational site for residents, fishermen, outfitter/guide clients and other visitors to the Pelican area. There is currently a dock located at the site that is under the jurisdiction of the City of Pelican.

Again, the City of Pelican supports the Large Group Area, Alternative 5 for Bohemia Basin.

Sincerely,

Kathia Wasserman

Kathia Wasserman
Mayor, City of Pelican



02 NOV 12 AM 9:53

November 7, 2002

Division of Governmental Coordination
Office of Management and Budget
State of Alaska
P.O. Box 110030
Juneau, AK 99811-0030

Re: Shoreline Outfitter/Guide DEIS State ID NO. AK 0207-211

Sealaska Corporation appreciates receiving the above referenced announcement and has reviewed the draft EIS. As the Native regional Corporation for Southeast Alaska, Sealaska takes very seriously how the Forest Service manages all of the natural resources on the Tongass National Forest so as to best benefit all citizens, especially those who reside in the rural communities. Therefore, how the management of outfitter/guide access to national forest lands is implemented is of great concern. The management of this activity must not diminish other obligations that the Forest Service is mandated to meet.

Sealaska supports Recommended Alternative 5 for incorporation into the management of the Tongass NF as long as the Forest Service is careful to assure that the management elements delineated below are not modified in any way that would adversely affect the social and economic needs of those who live in our region.

- Substance activities are very important to the economic and social fabric of all of the residents of the smaller communities, and to a lesser degree, residents in Juneau whose family ties are to traditional uses. The impact of outfitter/guide activities must not adversely affect the efforts of these participants to continue to be successful in their efforts to subsist. This program should provide a substantial cushion regarding outfitter/guide visits to make sure subsistence values are protected. It is essential that the Forest Service monitor the impacts of the outfitter guide management program so as to be ready to modify its implementation if there are indications of any negative impacts on subsistence.
- The Forest Service must monitor big game movements to the point that should there be any modification of big game habitat usage for which outfitter/guide activity may have been a contributor, the management of the outfitter/guide activities can be modified.

35/37

36/37

One Sealaska Plaza, Suite 400 • Juneau, AK 99801-1276 • Phone (907) 586-1512 • Fax (907) 586-1826

Appendix G—Response to Comments

10/3/03
1/1/03



City and Borough of Sitka

100 Lincoln Street • Sitka, Alaska 99835

139

01-02-03 02:22pm From: DIV OF CORRD 907 455 3075 T-641 P. 037/037 F-170

- TLMP provides for significant opportunities to manage national forest amenities for the benefit of citizens and visitors to Southeast Alaska. TTRA requires meeting the demands of the forest products industry as it endeavors to rebuild itself. Forest management, including timber harvest, is very important to supplementing the village and Southeast Alaska economy. Currently, village unemployment is very high largely due to the Forest Service's inability to offer economically viable sales. It is absolutely essential that the addition of an outfitter/guide program in no way hinder this requirement of TTRA.

- In recent years, village unemployment has been high due to the substantial reduction in timber harvest and modifications in the fishing industry. Villages have suffered because the quality of wages derived from timber harvest is substantially greater than from other industrial and service wages. The outfitter/guide program will have practically no beneficial effect on rural wage quality. Therefore, implementation of the program must be conducted in a manner that will allow other, more important employment segments to get back on their feet as that becomes possible.

Thank you for allowing Sealaska to respond.

Sincerely,

SEALASKA CORPORATION

Russell A. Dick

Russell A. Dick
Natural Resources manager

37/37

January 3, 2003

Shoreline Outfitter/Guide Project

ATTN: Mary Beth Nelson

USDA Forest Service

Tongass National Forest

204 Signakwa Way

Sitka, AK 99835

Dear Ms. Nelson:

RE: Shoreline Outfitter/Guide DEIS Comments

Enclosed are the written comments of the Sitka District Coastal Management Program, which apply to the Sitka Coastal District only (essentially the same 4,710 square miles encompassed in the City and Borough of Sitka). My specific Coastal Management comments had to be submitted to the Alaska Division of Governmental Coordination by December 10, 2002, and you were copied at that time. However, I have received more information about the overall scope of the Draft Environmental Impact Statement (DEIS) and have further comments in this cover letter. I would greatly appreciate both these December 10 comments (copy attached for reference) and these January 3, 2003 comments considered as part of your review.

My previous comments related primarily to the Sitka Coastal Management Program's Public Use Management Plan Special Management Areas, many of which could be significantly impacted by the potential for commercial uses, especially by "Large Group and Fifteen-Percent enclaves". But looking at this DEIS more globally, I believe there are some serious over-simplifications of issues, impacts, and actions that should be either corrected or perhaps dealt with separately.

The DEIS lumps all commercial uses and gives no guidance to Forest Service managers when allocating specific uses and specific permits. ALL COMMERCIAL USES ARE NOT ALIKE AND SHOULD NOT BE TREATED AS PERCENTAGES OF USE. Criteria should be established for evaluating and permitting various types of uses by category on a site-specific basis if this EIS is expected to cover all commercial uses.

Before I began my review, I assumed the Brown Bear Outfitter/Guide Study for Game Management Unit 4 was incorporated into this EIS. After I studied the Shoreline Outfitter/Guide document, I appeared to have been wrong, since there was hardly any mention of this major issue except for vague reference in the Executive Summary Introduction to a history of "moratoriums on permitting additional commercial outfitter/guide use in many locations and on commercial brown bear guiding in one Game Management Unit" and listings of "hunting" as a commercial activity and "brown bear" as a resource in various places in the document.

The major problem of rapidly increasing numbers of hunts and hunting guides in Game Management Unit 4, which spawned the broad-based group of experts in the Game Management Unit 4 Brown

Shoreline O/G EIS
2, p.0141
01/03/03

Providing for today...preparing for tomorrow

1/4

Response to Comments—Appendix G

Mary Beth Nelson
January 3, 2003
Page 2

Bear Management Team (BBMT), was not even mentioned under "Issues" in the Executive Summary. This issue should have been separated out from other generic issues and a specific management prescription developed, as was understood would be the case in the EIS. The current DEIS gives no guidance to managers on how to allocate between various types of uses or specific locations for the most part when issuing specific permits. This issue has large implications for other uses since brown bear hunting is basically incompatible with any other uses in the same location at the same time.

This lack of specific direction for how to handle bear guide permits in Game Management Unit 4 could mean that the Forest Service could internally change its administrative process at any time to drop the moratorium on limiting guided brown bear hunts or change recognition of human/bear high use zones. The EIS further ignores the major recommendations of the Game Management Unit 4 Brown Bear Management Team. The many participants in this effort, including the U.S. Forest Service, developed extensive recommendations which should at least be given serious point-by-point consideration by the Forest Service in this EIS if this is to be the only forum for pursuit of a better brown bear guide management scheme for Game Unit 4.

The accommodation of large commercial groups throughout the Sitka Coastal District is another concern. The public has not had an opportunity to understand or comment on why these many "Large Group and Fifteen Percent" enclaves were proposed to be opened to large groups. I provided specific arguments for why several of the Sitka Coastal Program Special Management Areas should not be opened to large-group use, but on what basis was it determined that there is such a widespread need for large group use? What would the impacts of these uses be to other traditional users, both consumptive and non-consumptive?

The DEIS should provide the data that shows that all there is a compelling need for all these locations to be opened to large groups, especially in areas where resource or use conflicts or degradation could be expected to occur. The DEIS lacks information on how the shoreline carrying capacity for these large group areas, or any others where commercial uses could potentially be permitted (which is apparently most of the study area), was actually developed, and why it is defensible. No large-group permit should unduly displace or be incompatible with other users.

The Sitka Coastal Program supports economic opportunities and the public's right (including visitors') to recreate on the National Forest. But a large number of "guests" going ashore in one location is likely to have significant impacts on other users, especially if it is a desirable destination for non-commercial users. Before any area is opened to large groups, there should be a site-specific analysis of the impacts of such use, and the area not opened to large groups if it is anticipated that a particular permit could cause substantial adverse impacts to other users or the area's resources.

The Forest Service has not attempted any known coordination to date with the Sitka Coastal Program to ensure its Special Management Areas are adversely impacted to the minimum extent possible. It would be extremely beneficial for the Coastal Program to have an opportunity to work

2/4

Mary Beth Nelson
January 3, 2003
Page 3

together to limit areas of conflict with users or resources in the final EIS. Likewise, it would be very helpful to know how the Forest Service is cooperating with the State of Alaska to ensure its shoreline carrying capacity information and allocations of uplands permit areas are in concert with the State's Northern Southeast Area Plan. The Coastal Program supports uses that are consistent with the adjacent property owner's uses (e.g., consistent zoning of uplands and tidelands).

The EIS should consider making some areas strictly off-limits to commercial users, rather than just mitigating impacts. For example, White Sulphur Springs is an exceptionally rare and extremely heavily used site in the West Chichagof Wilderness (Use Area 04-15). In Appendix C, Mitigation, mitigation for this site is proposed as: "Outfitter/guide use will not displace unguided users at White Sulphur Springs Bathhouse". But what does this mean? I presume the immediately adjacent Forest Service cabin would not be rented to commercial users, but if groups of commercial users show up at the bathhouse, it is likely their presence would displace the private cabin users, and the cabin is rented virtually all summer season. Perhaps this unique Special Management Area should be off-limits to commercial groups.

So should a number of other Special Management Areas, especially those with unique resources or site values. These areas are likely to have good anchorage and receive heavy non-commercial use for recreation and subsistence activities. At the very least, some areas should be off-limits to more disruptive, consumptive commercial uses which are incompatible with the present resource or use values of the area, at least during certain times of the year. The public should be able to recreate and subsist without running into commercial users in every location.

It is perplexing that every action alternative includes "Guided sport fishing on Redoubt Lake and Stream, Salmon Lake, Nakwasina River, St. John the Baptist River, and Fish Bay River would be seasonally restricted to no more than two guided groups at a time." Where did this arbitrary encouragement of up to two guided groups on these rivers come from? Why is even one commercial group permitted on some of Sitka's highest recreational and subsistence use areas? Can this be justified? Where is the carrying capacity, impacts to other users/resources, and analysis of the impacts of specific commercial uses on these special use areas quantified? Two commercial user groups using any of these systems simultaneously could cause significant adverse impacts.

A major deficiency in the DEIS is the lack of ability to revisit the site specific carrying capacities, to re-evaluate those that may have been incorrectly "labeled" or adjust for cumulative impacts or adverse impacts or resource damage done by permittees. There is no specific public process to enable reconsideration of a location which is not suitable for the uses for which it is listed. In such a large EIS, there are likely to be errors, unknown factors, or cumulative impacts unanticipated in such a broad analysis. The potential for a special use permit for an activity the public considers unacceptable in a specific location is fairly large.

If permitted activities in a site cause serious problems for other users or for the resources of the area, there should be a formal way that the public can intervene to correct the problem. It appears the

3/4

Appendix G—Response to Comments


Mary Beth Nelson
January 3, 2003
Page 4

Monitoring Appendix D is almost entirely an internal Forest Service process, which can be insulated from the impacts to the rest of the world, or from the ability of any other entities to intervene. There should be no guarantee that any commercial use will be automatically permitted, or receive automatic renewals, with no right for the public to intervene if serious adverse impacts are occurring. The EIS needs to show a good-faith effort to a monitoring plan which determines how meaningful the carrying capacity and management numbers really are and what the actual impacts to both users and resources are once the plan is implemented and special use permits are issued.

Whatever alternative is selected in the FEIS, it should better reflect real present needs, not a presumption of vastly expanded future uses. Large group sizes should be restricted to fewer, better thought out sites which will not cause serious adverse impacts to other users. Bear Outfitter/Guide activities in Game Management Unit 4 should reflect the Brown Bear Management Team recommendations and be broken out as a separate area of management from other commercial uses and managed under a permanent allocation process rather than an administrative process subject to change. The public should have an opportunity to comment meaningfully and directly on needed changes to activities which cause unacceptable use conflicts or harm to resources as a formal part of the monitoring plan. Management decisions should be defensible and based on site-specific analysis. Finally, periodic re-evaluation and ongoing monitoring involving the public are essential components of any mitigation management effort.

Thank you very much for the opportunity to add these general comments. I would be pleased to work with the Forest Service to provide more detail if requested. I can be reached at 747-1855; e-mail campbell@cityofsitka.com

Sincerely,


Madelene A. Campbell
Coastal Management Coordinator

cc: Tom Puchlerz, USDA Forest Service
Carol Goularte, USDA Forest Service
Phil Mooney, Alaska Department of Fish and Game

4/4



Organized Village of Kake

P.O. Box 316

Kake, Alaska 99830-0316

Telephone 907-785-6471

Fax 907-785-4902 / email KeexKwaan@siarband.net

(Federally Recognized Tribal Government serving the Kake, Alaska area)



January 3, 2003

Shoreline Outfitter/Guide Project

Attn: Bill Tremblay

USDA Forest Service Tongass National Forest

204 Sigisaka Way

Sitka, Alaska 99835-7316

Re: Comments on Shoreline Outfitter/Guide DEIS

Dear Mr. Tremblay

The Organized Village of Kake (OVK) would like to make the following comments related to the Shoreline Outfitter/Guide Draft Environmental Impact Statement (DEIS) prepared by the Forest Service. The Organized Village of Kake would like to adopt the comments made by Southeast Alaska Conservation Council (SEACC) through our member group, that represents the Village of Kake, the Customary and Traditional Gathering Council of Kake.

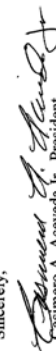
Planning by the US Forest Service is important to all of Southeast Alaska and the Nation. As mentioned in the US Forest Service Shoreline Outfitter/Guide Analysis seven-page newsletter on page 5 under "Subsistence-None of the alternatives would restrict subsistence use of resources." OVK appreciates this comment. OVK would like to stress again the comments we made at the meetings that we have had with the different representatives that have presented the Shoreline Outfitter/Guide Analysis to our Kake people:

- Kake uses all of our Customary & Traditional Gathering area on the East side of Baranof Island from Hazy Islands to Cape Ommaney up to Warm Springs Bay, and hunt in especially Kelp Bay with our Angoon family.
- Kake uses all of our Customary & Traditional Gathering area on the East side of Admiralty Island, from Pt. Gardner up the Admiralty Island National Monument coastline to Seymour Canal and Glass Peninsula.
- Kake uses all of our Customary & Traditional Gathering area on the main land from Thomas Bay to the North arm of Tracy Arm-Ford's Terror Wilderness.
- That the Kake people use these areas for Customary and Traditional Gathering (subsistence) that includes but not limited to the solitude, spiritual, sacred village & burial sites, gathering & sharing our natural resources with our people in our village.

Note that I have abbreviated the area to the major landmarks and not the Use Codes, any use in these areas greatly affect our OVK members and what we gather during the seasons. We have mentioned to the US Forest Service presenters that we are more than willing to sit down to talk about where we hunt and gather when and where, so that we may help mitigate use conflicts with the other users of our areas.

Please contact Gary Williams or Mike Jackson at OVK to ask questions about this letter or the use of Kake Customary & Traditional Gathering area, at the above address.

Sincerely,


Casimero A. Aceveda Jr., President

Shoreline OVG EIS

2g-0157

01/03/03

1/2

Response to Comments—Appendix G

Mary Beth Nelson



"Koch, Denise"
<denise_koch@envirc
on.state.ak.us>
01/07/2003 03:45 PM

To: "mmelson03@is.fed.us" <mmelson03@is.fed.us>
cc: "Kaiser, Gretchen" <Gretchen_Kaiser@envirocon.state.ak.us>
Subject: Shoreline Outfitter Draft EIS

04:02:13 PM 01/07/2003

145

Mary Beth,

Thank you for allowing me to submit comments on the Forest Service Shoreline Outfitter Draft EIS.

I manage the Alaska Department of Environmental Conservation (ADEC) Commercial Passenger Vessel Environmental Compliance a.k.a. "cruise ship" program. The state's cruise ship program applies to vessels that carry at least 50 overnight passengers for hire. I imagine that small cruise ship operators will be interested in the final selection of the alternatives, preferring an increase in commercial use.

The ADEC with the assistance of an independent Science Advisory Panel (<http://www.state.ak.us/dec/press/cruise/documents/sciencepanel.htm>) recently finished a report entitled "The Impact of Cruise Ship Wastewater Discharge on Alaska Waters - November 2002" (<http://www.state.ak.us/dec/press/cruise/documents/impactcruise.htm>). In the Executive Summary of the report, it states:

"Although small commercial passenger ships represent only about 6% of passenger vessel wastewater discharge in Alaska waters, their effluent often contains high levels of fecal coliform and suspended solids. These vessels are currently allowed to discharge everywhere. The Panel, therefore, recommends that these ships should avoid stationary discharge, particularly in small fjords and embayments where the movement or flux of water is limited."

The ADEC cruise ship program does not have wastewater monitoring data for day and tour boats. I would guess however, that the wastewater discharged from these vessels also contains high levels of fecal coliforms and total suspended solids.

Therefore, I suggest that the Forest Service consider the potential environmental impact on bays and protected water bodies when setting the commercial use allocation for small commercial vessels in the Tongass National Forest and the Admiralty National Monument. This would be especially important in areas commonly used for subsistence and recreation shellfish harvesting.

Sincerely,

Denise Koch

Commercial Passenger Vessel Environmental Compliance Program Manager
Alaska Department of Environmental Conservation

Shoreline O/G EIS
2,5-0161
01/07/03

1/2

Sealaska Heritage Institute

One Sealaska Plaza, Suite 201
Juneau, Alaska 99801-1249
(907) 463-4844
Fax: (907) 586-9293

8 April 2003

Sitka Supervisor's Office
Tongass National Forest
Attn: Shoreline Outfitter/Guide EIS
204 Signika Way
Sitka, AK 99835

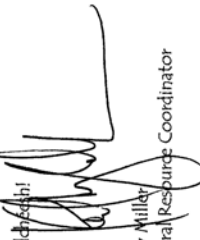
Here are my Comments on the Shoreline Outfitter/Guide Analysis:

I appreciate the specific clauses and stated legal responsibilities in the guides' contracts which sufficiently address two of our concerns: 1) disturbance of Native sites and Native Human remains, and 2) removal of objects from Native sites.

I would like to suggest that perhaps Native Preference be given, among otherwise qualified guides, that would be frequenting the areas a) with the highest number of known sites, and b) with the greatest 'potential' of encountering new Native sites.

It is clear that the suggested project [in any of the alternatives] would not in and of itself pose a negative impact on subsistence use in SE. In continuing your sensitivity to subsistence issues, I would hope that large groups would not be allowed to go into certain places around [not just at] the specific times where subsistence activities take place.

I appreciate your acknowledgement of and attention to Native needs and concerns in your planning process.

Gunalchesh! 
Kathy Miller
Cultural Resource Coordinator

Shoreline O/G EIS
2,5-0171
04/08/03

1/1

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

□ SOUTHCENTRAL REGIONAL OFFICE
550 W. 7TH AVENUE, SUITE 1660
ANCHORAGE, ALASKA 99501
PH: (907) 269-7470/FAX: (907) 269-3981

□ PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501
PH: (907) 257-1351/FAX: (907) 272-3829

TONY KNOWLES, GOVERNOR

August 29, 2002

Bill Tremblay
USDA Forest Service
Tongass National Forest
204 Saginaka Way
Sitka, AK 99835-7316

Dear Mr. Tremblay:

SUBJECT: SHORELINE OUTFITTER GUIDE DEIS
STATE LD. NO. AK 0207-21J
START OF ACMP REVIEW

On the Division of Governmental Coordination (DGC) received the complete federal consistency determination and supporting information you submitted for State of Alaska review and agreement under Section 307(c)(1) of the Federal Coastal Zone Management Act as per 15 CFR 930, Subpart C. The proposed activity affects the coastal zone of Alaska, and therefore requires review for consistency with the Alaska Coastal Management Program (ACMP). This letter initiates the State review of the proposed activity under the process described in State and federal regulations as outlined below.

Scope of Project to be Reviewed

The activity subject to this review is a Draft Environmental Impact Statement for commercial outfitting and guiding activities on the shoreline of the Tongass National Forest in northern Southeast Alaska. The analysis area for this project includes approximately 7,018,700 acres of the Admiralty Island National Monument, and the Hoonah, Sitka and Juneau Ranger Districts. The shoreline zone of the analysis area extends one-half mile inland from mean high tide, and includes approximately 5,300 miles of shoreline. Eleven communities are within the analysis area: Juneau, Sitka, Port Alexander, Tenakee Springs, Pelican, Elfin Cove, Gustavus, Angoon, Hoonah, Haines and Skagway. Two areas on Admiralty Island are excluded in the DEIS: Mitchell Bay and environs, and the Pack Creek Zoological Area. The national forest shorelines associated with the Juneau and Sitka road systems are also not included.

The purpose of the project is to manage outfitting/guide use of the Tongass National Forest shoreline zone within the analysis area to balance commercial and non-commercial recreational uses. Guided visitor levels would be managed to maintain quality recreation experiences without

Shoreline/Outfitter Guide DEIS
AK 0207-21J

Page 2

August 29, 2002

degrading forest resources or the recreation experiences sought by both guided and unguided recreationists. The project is intended to determine the amount of carrying capacity allocated to commercial use, specify the types of commercial recreation activities permitted, specify methods of access approved for commercial use, specify the types and locations of areas where large groups can occur and under what conditions, specify mitigation measures for commercial recreation activities, and establish monitoring requirements. Five alternatives are analyzed in the DEIS, with Alternative 1 the "no action" alternative, and Alternative 2 the "preferred alternative."

Additional Information

This project was initiated due to the expiration of the decision made from the *Chatham Area Outfitter/Guide Limited Use Environmental Analysis* (USDA Forest Service 1993). Following that expiration and in response to concerns over increases in recreation and tourism on the Tongass National Forest, the USFS placed moratoriums on permitting additional commercial outfitting/guide use in many locations. In 2001, the USDA Forest Service prepared the *Shoreline Recreation Carrying Capacity Analysis for Admiralty Island National Monument, Hoonah, Juneau, and Sitka Ranger Districts on the Tongass National Forest*. This EIS is intended to further analyze the potential effects of authorizing different levels of commercial outfitting and guiding activities within the shoreline zone of the analysis area.

Review Process

I distributed the packet of information to the following review participants: Alaska Departments of Environmental Conservation, Fish and Game, and Natural Resources, the Sitka, Hoonah, Haines, Pelican, and Juneau Coastal Districts, and other interested parties (see distribution list). A notice issued on August 19, 2002, and supplemental notice posted on August 29, 2002, informed the public of the proposed activity. The DEIS document may be obtained from the U.S. Forest Service, Sitka Ranger District, 204 Saginaka Way, Sitka, AK, 99835, 907/747-6671, e-mail btremblay@fs.fed.us.

State review participants will evaluate the proposed activity for consistency with the statewide standards of the ACMP (6 AAC 80) and the enforceable policies of the Sitka, Hoonah, Haines, Skagway, Pelican, and Juneau Coastal District Programs. For the purposes of ACMP review of this DEIS, reviewers are asked to focus their comments on the standards contained in 6 AAC 80.040 - 6 AAC 80.150, particularly the standards for coastal development, recreation, fish and seafood processing, subsistence, habitats, air, land and water quality, and historic, prehistoric, and archeological resources.

Commentaries may recommend alternative measures necessary for the activity to be consistent with the ACMP. The public also may submit comments. The review schedule is listed in the attached project information sheet. DGC will receive review and public comments before 5:00 p.m. on September 30, 2002. DGC will review and integrate the comments as appropriate and issue a proposed consistency finding that contains any alternative measures necessary to make the activity consistent, to the maximum extent practicable, with the applicable standards and district policies of the ACMP. The U.S. Forest Service, State resource agencies, and any affected coastal resource district have five days from receipt of the proposed consistency finding

Appendix G—Response to Comments


AUG-25-03 MON 04:18 PM FOREST SUPERVISOR FAX NO. 2286292 P. 02

Shoreline/Outfitter Guide DEIS
AK 0207-21J Page 3 August 29, 2002

to request elevation of the proposed finding. DGC will issue a final consistency finding by the end of the review period, unless the USFS and DGC agree to additional time. The USFS may not take final action on the proposed activity sooner than 90 days from the date the State received the consistency determination unless the USFS and DGC agree to an alternative period (15 CFR 930.41(c)).

By a copy of this letter we are informing the U.S. Forest Service that the State has begun its consistency review. Please contact me at 907/465-8791 or email sandy_harbanuk@gov.state.ak.us if you have any questions.

Sincerely,


Sandy Harbanuk
Project Review Coordinator

Enclosure

cc: Packet Distribution List

DEPARTMENT OF NATURAL RESOURCES DIVISION OF PARKS AND OUTDOOR RECREATION OFFICE OF HISTORY AND ARCHAEOLOGY

FRANK H. MURKOWSKI, GOVERNOR

550 W. 7th Ave., SUITE 1910
ANCHORAGE, ALASKA 99501-3555
PHONE: (907) 263-0721
FAX: (907) 269-8808

August 18, 2003

File No.: 3130-1R USFS

SUBJECT: Shoreline Outfitter and Guide, Tongass National Forest, Alaska

Thomas Puchlerz
Forest Supervisor
Tongass National Forest
648 Mission Street
Ketchikan, AK 99901

Dear Mr. Puchlerz:

We have reviewed your correspondence and the report *Living Resources Investigations for the Shoreline Outfitter and Guide EIS* (7/8/2003) for conflicts with cultural resources under Section 106 of the National Historic Preservation Act. We concur that the historic properties within the project area will not be adversely affected by Shoreline Outfitter activities provided that the stipulations presented in the referenced document are followed (requirement that outfitter/guides observe "Leave No Trace" principles, limits on amount of permits issued for a particular area, periodic monitoring of sites by Forest Service archaeologists, etc.).

Please note that to date, that only 8 of the 21 cultural sites listed under Table 7, and 2 of 13 sites in Table 8 have undergone review by our office regarding eligibility for the National Register of Historic Places. More information is needed before we can concur with your determinations of eligibility of the remaining sites.

Please contact Stefanie Ludwig at 269-8720 if you have any questions or if we can be of further assistance.

Sincerely,



Judith E. Bittner
State Historic Preservation Officer

JEB:all

Shoreline O/G EIS
8/14/03
08/19/03

5/31

1/1

Sitka Conservation Society

PO Box 6533
Sitka, Alaska 99835
(907)747-7509
(907)747-6105 fax
home.gci.net/~sitkawild

Shoreline Outfitter/Guide Project

Mary Beth Nelson
204 Siginiak Way
Sitka AK 99835-7316

December 21, 2002

The Sitka Conservation Society is very supportive of the efforts the Forest Service is making to plan recreational management. We understand that this is a new effort for the Forest Service and it is a struggle to devise the best methods. We hope that our ideas and comments will be useful to you, and that you will be able to incorporate them as you move forward.

We do feel there are some fundamental flaws in the way the Shoreline Outfitter DEIS is structured, as discussed below. These flaws make the document very confusing, and result in an inability to discern from the document what would actually be permitted or what level of use a visitor might expect in a given spot. This then makes it impossible to assess cumulative impacts, or develop a regional image of use patterns. It makes it very difficult for the general public to be involved in, or comment upon, this management process.

The document mixes and matches various spatial units and measures of use. This is very confusing. Everything should be related to one type of spatial unit and measure of use. The document ultimately relies on the recreation opportunity spectrum inventory, which has never been made available to the public, or updated. The 1997 TLMP relied on a ROS that was done in 1989. Planning at that time was predicated on the expectation that intensive timber development would occur in many locations, where it has never actually materialized. Rather than relying on the ROS class predicted in TLMP, the document should treat locations by the conditions at the site, and manage to protect the existing primitive conditions.

We question whether the ROS class should be used as the basis for planning anyway, since an updated inventory is not available to planners or the public. Furthermore, the ROS system is designed to provide a spectrum of classes of experience, ranging from primitive to urban. We do not believe visitors come to Alaska to experience more developed types of outdoor recreation that are readily available in other locations. Rather, they come to Alaska to experience "wilderness". The Forest Service should be managing for primitive and semi-primitive opportunities and to keep more intensive tourism developments only where the road system is well developed.

Using the Land Use Designation as a spatial unit for management seems to make more sense, since it can readily be mapped, and the ROS classes relate to the LUD classes. Furthermore, the ROS classes can be changed at the district level. Future recreation planning in the Tongass needs a more comprehensive look and systematic planning of land management than district-by-district decisions.

Capacity then should be calculated for each shoreline area within each LUD. Currently, capacity has been calculated by guided use area. This is a spatial unit obtained from Alaska Department of Fish and Game for managed game hunting. It does not relate to the spatial units by which the Forest Service defines recreational management. In the Sitka guided use area for

Shoreline OIG EIS
2.9-0067
12/21/02

1/6

instance, the total capacity is set at 40 groups per day. Under Alternative 3, 50% of that would be allocated to commercial guided use. Within the Sitka guided use area however, the number of encounters per day and group size changes between the middle of Kruzof Island and the south end of Kruzof, because the middle of the island is designated for timber management. Therefore, the total capacity does not really clarify how many groups, of what size, could land where. The DEIS thus fails to fully disclose impacts. It would be much simpler to just relate the number of groups and group sizes to the LUD, which could be readily mapped.

We also believe other management systems should be considered rather than simply varying the percentage allocated to commercial use and enclave locations.

These flaws are so fundamental that a supplemental DEIS is required. If the Forest Service is not able to do a supplemental, and chooses to continue on with this flawed process, we strongly encourage you to continue a dialogue with those who commented on the draft document as you work to produce the final decision. Without that dialogue, we are concerned that staff will be mired in the details, and unable to get a big picture of how the final alternative choices will affect the users and resources of the Tongass.

We also believe that the absence of current data on the extent of recreational and guided use is an incredible obstacle for management. We are concerned that there will be a re-creation of the problems with timber management. Due to a lack of accurate data on timber volume, smaller stream locations, stand structure, habitat quality, unstable soils, etc, the Forest Service permitted over-harvesting and high-grading. The falldown created by the false expectations of available timber created economic hardships on communities, and management crises. The Forest Service may find itself in a similar situation now in assuming that capacity is higher than it is, and ecological damages less than will actually result. The Forest Service must make an immediate priority of assessing the current extent of recreational use, and users experience of conflict. One method that seems promising is a residents survey in which the respondents are queried on the extent of their encounters and the quality of their recreational experiences. To encourage response, there should be significant prizes awarded through random drawings of respondents. Aerial photographic surveys of boats at anchorages could be conducted as well.

SCS had hoped to provide area specific comments on capacity limits in the DEIS. However, it became apparent in our committee meetings that there was a range of opinions on the appropriateness of the capacity numbers. One of the problems with this document is that it is tiered to an earlier document that defined capacity, but that document was never released to the public as a range of capacity alternatives for public comment. In the DEIS, capacity is discussed as minimum, maximum, or optimal. Rather than picking optimal capacity, minimum capacity should have been chosen as the working point until better data is available.

All of our committee members agreed however, that the rate of increased use of each area proposed in the DEIS is far too high. The Forest Service should be cautious in the level of use until better data on existing use and conflicts is available. The Forest Service has not demonstrated demand, capacities could be too high, and the Forest Service is not keeping options open. The numbers should be kept down until the Forest Service can prove its ability to do mitigation, measure compliance, and collect impact data on wildlife and other users. In the comments from our individual members, you will hear the opinions on the capacity definitions for specific areas.

2/6

Appendix G—Response to Comments

We have concerns with the following premises of the Forest Service

- Currently the FS believes there is only a small amount of use occurring on the national forest shoreline zone
- The Forest Service has no data on the amount of use. Observers report frequent illegal guided use. Use is likely to be targeted in certain locations with good access. The overall shoreline use may be low, but key locations may already be receiving significant use.

- As a result of action alternatives, the FS expects that no significant effects on forest resources from guided activities. Any potential direct effects would be slight, short duration, and localized, any cumulative effects would be minor. The FS expects little or no impact on unguided recreationists, subsistence users, wilderness, threatened species, and cultural resources (no guided use of cultural sites allowed) from any action alternative.

As occurred with timber harvest, all users are likely to be struggling to access certain prized locations. Because these are often key locations for wildlife as well, it is quite possible that significant wildlife displacement and subsistence harvest impacts could occur. This assumption of no ecological damage is a fundamental flaw in the DEIS. Any location receiving consistent use from people is bound to experience degradation.

- Recreation management is new to the Tongass and lacks data. The FS must rely on monitoring and mitigation.

Significant problems have been identified with FS monitoring practices since the 1997 TLMF and prior. Mitigation of resource damage is generally very expensive and often does not work. The Forest Service should make a priority of obtaining data, and should manage very cautiously until the data is available. We are very concerned by the lack of clarity on how the Forest Service will implement this plan; how will the plan be monitored and enforced? It seems likely that resource conflicts will hurt smaller operators or the unguided public, to the benefit of larger operators. On page 3-27, 2nd to last paragraph, the DEIS states that if capacity is exceeded, the Forest Service will review capacity and reduce ROS or limit unguided use. This is a significant issue that needs to be addressed now. The capacity must be accurate. Reducing a ROS means accepting degraded conditions. Rather than allowing inflated guided use, the Forest Service must manage to protect the existing uses and quality of recreational experiences available to the unguided public.

Range of Alternatives

1. Current Status. Case by Case Review of Permits. No specific allocation.
 2. Limited commercial use during spring and fall. No designated large group areas, no wheeled airplane access. Moderate allocations, about 21% total capacity.
 3. Highest use allocations (50% of total capacity). Emphasis is on increasing access rather than providing opportunities for solitude.
 4. Emphasis is on maintaining solitude. Lowest allocation (8% total capacity)
- F.S. preferred alternative. Limited commercial use during spring. Some large group areas assigned, limited wheeled airplane landings in some places. (Allocation is 23%)

We do not support the no action alternative, because we believe it important that the Forest Service address recreation management in a more systematic way than case-by-case review. We believe alternative 3 is a very dangerous choice, given the lack of data on existing use. We support the emphasis of alternative 4 on maintaining solitude and the most cautious allocation.

The proposed alternatives differ in the % of total capacity allocated to commercial use, and the number and location of enclaves or 15% areas. We believe the range of alternatives should include an alternative with a different management system, similar to that used for commercial halibut fishing, in which a set number of operators is permitted by operation size and area. That way an operator with 12 guests would know they had x number of other operators within that size range in their area, and maybe one or 2 bigger operators.

The number of groups is a poor allocation measure

A fundamental flaw in the system is the reliance on the number of groups as the unit of measure. Since group size can vary from 1-75 people, the number of groups does not capture the total environmental or social pressure that could occur. The Analysis team is relying on the current average group size and assumes they have adequately allowed for future increases in pressure. This is a dangerous assumption. The recent trend in the industry has been growth at about 10% per year. The trends in large cruise ships can be looked to as an example. The companies are building boats that maximize the number of passengers per ship.

In this proposed management system, the Forest Service is creating an inducement to mid-size cruise operators to maximize the number of people they can fit into a group, since they will be limited not by total people but by the number of groups. While the recreation opportunity spectrum will fit into management as well, the danger still exists.

Since the ROS is not mapped, the public has no way of ascertaining where larger groups, other than enclave locations, may go ashore. As well, the social and ecological responses to large group encounters are far different than for small. The Forest Service must explicitly manage and locate groups by their size. The failure to do this is a very serious defect of the draft EIS.

A more accurate way to meter pressure would be to consider group size, number of groups, and environmental/social burden per person and group.

Confusion of Units

Tables in Chapter 2 describing differences between alternatives report units as total group days, rather than total number of groups, the unit used elsewhere, as in Appendix A. The document should be consistent throughout in its analyses and also discuss use in terms of the same units, or where impossible explain why.

In table 3-21 there may be confusion between number of groups and days. The table says that use is presented in groups. Under alternative 3 the total number of groups would then be 14,637. Divided by the number of days in a year, this would then be 40 groups per day. Wilderness guidelines presented in the Tongass Land Management Plan specify less than 3 encounters per day for a wilderness primitive experience. It is difficult to imagine how this many groups could not encounter each other, given the ruggedness of the shoreline, and the number of anchorages. Furthermore, the number 14,637 seems overly precise, given the speculative nature of assumptions about capacity and use. Why not round the numbers off so that they are easier to grasp and compare? The document seems full of these type of tables, which overload the reader with detail which is not really very meaningful, and make the important points harder to distinguish.

There is a similar problem in the overall description of capacity, where spatial management units change.

SOUTHERN ASSOCIATES IN CARDIOLOGY, P.C.

BOARD CERTIFIED CARDIOVASCULAR SPECIALISTS • DIPLOMATES OF THE AMERICAN BOARD OF INTERNAL MEDICINE
TERRY Q. CALLESTER, M.D., F.A.C.C. • DONALD J. RUSO, M.D., F.A.C.C. • NICHOLAS J. LIPPOLIS, M.D., F.A.C.C.
JUNG H. LEE, M.D. • KATHY JO DINCAN, P.A.C. • IRINA A. BROWER, P.A.C.

December 26, 2002

Shoreline Outfitter/Guide Project
Attention: Mary Beth Nelson
USDA Forrest Service
204 SIGINAKA Way
Sitka, Alaska 99835-7316

Dear Ms. Nelson:

I am writing this letter at the behest of the Chichagof Conservation Counsel. I am quite concerned about the new proposals regarding Tenakee Inlet. I am particularly concerned about your definition of the word, "group." As you know from your definition, up to 75 people can count as one group. This I feel can lead to depletion of the resources. Tenakee, as you know, has 178 miles of shoreline, and I believe sites specific analysis is extremely important. I feel it is also very important to record and request "primitive" designations for pristine areas, especially those that are now roadless. Before any rash decisions are made, I would hope that these considerations are taken into account. As you know, mistakes made now may take a very long time to correct in the future.

Although Tenakee is a small town, the people there live close to the land, and their entire way of life can be adversely impacted by just small mistakes made by others. Careful consideration and local input needs to be considered by those who would not want to turn the Tenakee inlet into another Yosemite or Yellowstone National Park at this time.

Thank you for your consideration,

Donald J. Russo
Donald J. Russo, M.D.
1381 Drakes Creek Road
Hendersonville, TN 37075-8519

cc: Chichagof Conservation Counsel
Box 621
Tenakee Springs, Alaska 99841

Shoreline OIG EIS
2.9-0076
12/26/02

1/2

353 NEW SHACKLE ISLAND RD., SUITE 110 • HENDERSONVILLE, TN 37075 • OFFICE: (615) 824-0043 • FAX: (615) 822-1690
214 NORTHCREST DRIVE • SPRINGFIELD, TN 37172 • OFFICE: (615) 384-0566 • FAX: (615) 384-5511

Enclaves

We are very concerned that the discussion of enclaves makes no attempt to describe or model the likely development of the location. It is difficult to support the location or designation of any enclaves in the absence of such a discussion, and what limits would be imposed about enclave growth. Any area receiving regular visits of up to 75 people per day is likely to need a dock, some sort of latrine or human waste system, and trail hardening. What will be the ultimate fate of this waste? Will it cause pollution or nutrient enrichment? The more an enclave is used, the more impact there may be for the addition of amenities. What will be the Forest Service policy on these developments? How will private recreational users feel in the presence of such developments, will they feel the bay has become private property and they are not welcome?

We are opposed to the location of any enclaves in areas with high wildlife values. It would be better to locate the enclave in a separate location, and send visitors over in smaller groups. We are opposed to the location of any enclaves at the head of estuaries, which are always very productive areas, used extensively by bears. For these reasons we do not support the locations of enclaves in Sitkoh Bay, Saook, Ushk Bay, Poison Cove, Goose Flats, the West Arm of Kelp Bay, and Lake Eva. SCS has long supported interpretative trails and bear viewing at Lake Eva. However, we are concerned about the impacts of large groups on the values of Lake Eva. We believe it would be better to have the enclave at Hamus Bay, and visitation at Lake Eva be in smaller groups.

We understand the Forest Service interprets visitation at 15% areas to average over a season, but could allow very extensive use in just a couple of weeks. We are concerned that this interpretation was not obvious to public commenting on the document, and that this type of extensive use would be essentially equivalent to an enclave. The same sorts of ecological and social damage could occur. A likely scenario for such a visitation pattern could be when bears are feeding on a salmon run, or concentrating in grass flats in the spring. 15% use should be averaged by the week, not by the season. As with enclaves, the Forest Service should not locate large group areas in areas with high wildlife values, such as the head of Fish Bay and Hoonah Sound.

The Forest Service should incorporate consideration of values identified by the Alaska Department of Fish and Game as especially sensitive to disturbance; all of Tenakee Inlet highest has the highest sensitivity. Pt. Adolphus, Ushk Bay, Sitka Sound, SW Admiralty, and Cape Fanshaw are sensitive areas. This is based on deer as an indicator, and there are other ecological factors that should be considered in addition. It is likely that there will be much more impact to subsistence users than acknowledged in the DEIS.

If an area is not managed as an enclave, it is considered appropriate for multiple landings of small group, eg. Kadashan. Here multiple groups of 12 could be put ashore all day as long as they don't encounter each other. This is a weakness of the proposed management. Such multiple landings could have extensive ecological damage or social problems for the unguided public.

Thank you for the opportunity to comment on the DEIS. We look forward to continuing to work with you on the challenging task of planning for the recreational management of the charismatic Tongass National Forest.

Sincerely,
Page Else, Research Director

Page

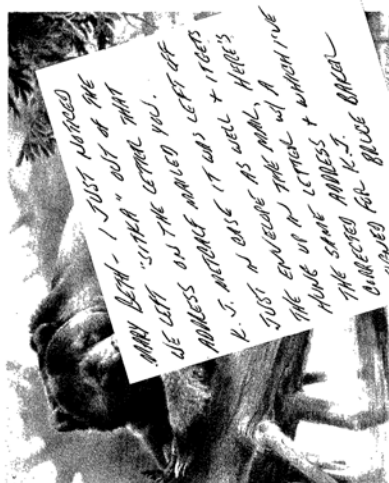
5/6

Appendix G—Response to Comments

DEFENDERS AND FRIENDS OF ADMIRALTY ISLAND
AND
TONGASS WILDLANDS WATCH

16

P.O. Box 20791
Juneau, AK 99802
Ph/fax (907) 586-6738
admiralty_friends@yahoo.com



December 30, 2002

Shoreline Outfitter/Guide Project
ATTENTION: Mary Beth Nelson
USDA Forest Service
Tongass National Forest
204 Signaka Way,
Sitka, AK 99835-7316

Re: Shoreline Outfitter/Guide Draft Environmental Impact Statement

Dear Ms. Nelson:

We appreciate the opportunity to comment on the Forest Service's (FS) July 2002 *Shoreline Outfitter/Guide Draft Environmental Impact Statement* (DEIS). Friends of Admiralty Island is a non-profit public interest and volunteer organization that was formed in 1997 and has a membership of 250. Our principal focus is to help protect Admiralty Island's wildland values and to foster public education and appreciation of these values. One of our objectives is to advocate a healthy and wild population of Admiralty Island brown bears. This requires a healthy breeding population of bears, adequate habitat, and educating people how to act in bear country. Another objective is to recognize that what happens on the nearby mainland and on other islands in Southeast Alaska has a significant bearing on the human pressures on Admiralty's natural resources. For that reason, we are concerned about FS management in places other than just Admiralty itself and are especially interested in what the FS has proposed in the DEIS.

We are commenting on the DEIS as an organization that had the privilege of being represented on the Game Management Unit 4 Brown Bear Management Team (BBMT).

As you recall, the BBMT was convened by the Alaska Board of Game to address a variety of significant issues that relate to brown bear management on the ABC islands (Admiralty, Baranof, and Chichagof). The Forest Service's *Saltwater Shoreline-Based Outfitter Guide Analysis* was

Shoreline O/G EIS
2-g-0083
12/30/02

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide

2

described by your agency at the time as an important element in the overall management of ABC island bears. The team took seriously the opportunity to comment on that analysis. Team members spent many hours preparing the 14 overall recommendations that appear in the May 6, 1999 letter that was sent from Greg Streveler, BBMT Chair, to Fred Salinas, Assistant Forest Supervisor during the FS scoping process.

Based upon our representation on the BBMT, we are disappointed to see that few of the BBMT's 14 overall recommendations or the significant issues they addressed have been dealt with adequately in the DEIS. In fact, it seems like the FS lost sight of its original purpose. The FS seems to have ignored the significant issues that were identified by bear hunting guides, a variety of other interests, and the agency itself. One of these issues is excessive competition between bear hunting guides in Game Management Unit 4 (GMU 4) and the need for the FS to adopt a more conservative policy for issuing brown bear guide permits on national forest land. This policy needs to be predicated on defensible criteria that your agency can use to determine the maximum threshold number of guide permits that it will issue in a particular area. These criteria need to be written in a way that they would be likely to stand up in court if challenged. The other significant issue that your agency and others on the BBMT were looking forward to being resolved in the DEIS is the need to come up with an approach for allocating public use of shoreline segments where conflicts between users either have become acute or are rapidly heading in that direction.

The DEIS addresses neither of these issues in a thorough and defensible way. Instead, the major thrust of the DEIS appears to be the accommodation of large commercial groups of as many as 75 people at a time. Most of the decision alternatives in the DEIS, including the FS's "preferred alternative 5" would authorize large numbers of visitors to go ashore every day of the summer season in areas for which you have indicated no defensible demand data. The DEIS also provides no meaningful data supporting your implied assumption that these numbers are perfectly compatible with brown bear behavior and habitat use within a half mile of the mean high tide line.

To say that the allocation of bear hunting guide permits may be addressed in a separate prospectus, as an FS EIS team member did at a recent meeting is a violation of the public trust. The public was lead to believe for more than four years that this EIS would address the issue of the number of bear guide permits. If the FS planned to solve the issue through a prospectus, then it should have done so a few years ago. Regardless of whether you ultimately resolve this serious threshold issue in the FEIS or in a separate prospectus, you are strongly urged you to do so soon and to do so in a way that insulates the FS guide permitting process from successful legal challenge by a guide who asks why you cut off the number of guides permitted in an area with him/her and not with the next guide who walks in the door with a permit application in hand.

Changes to the EIS that would address significant issues and bring it closer in line with the BBMT's recommendations would be to 1) provide definitive demand data that demonstrate why such large groups need to be authorized so often and in so many areas, 2) describe the impacts to bears and other wildlife habitat that are expected to result from the proposed large numbers of

2

2/9

1/9

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide 3
people going ashore, 3) lower the group size and number figures for large groups, 4) provide better justification and basis for each of the "15 percent areas" and large group "enclaves," 5) commit to a more proactive monitoring and testing plan to determine how meaningful the decision numbers really are and what the actual impacts to brown bear and other wildlife behavior are, and 6) commit to periodically bringing people back together to see what the demonstrated impacts have been and to make necessary adjustments in the allocation decision numbers from one year to the next.

The following are Friends of Admiralty Island's comments on the degree to which the FS appears to have addressed the Unit 4 Brown Bear Management Team's 14 overall recommendations. The numbers correspond with those of the recommendations in the team's May 6, 1999 letter.

1. **Cooperation with the State.** The DEIS lacks any detail as to how the FS has prepared its shoreline carrying capacity determination in cooperation with the State of Alaska to ensure that they are complementary. The EIS needs to display what resource allocation decisions the state has made in waters adjacent to each upland area that the FS has addressed in the EIS.

The reader of the DEIS learns little from the general statement on page 26, Chapter 1, that "The Forest Service is working closely with the State of Alaska Department of Natural Resources to ensure that the management of the national forest and adjacent state lands and waters are compatible to the maximum extent possible." The EIS needs to explain to exactly what the state has decided adjacent to each large-group area in order to determine what the significant issues are and what the cumulative environmental, social, and economic effects are. The National Environmental Policy Act (NEPA) requires the FS to consider cumulative actions, which when viewed with the proposed action have cumulatively significant impacts on the human environment (see 40 C.F.R. 1508.25 (a)(2)).

2. **Groups.** The DEIS does not reflect the BBMT's recommendations on group size. It describes the size of only one group – a large one – the size of which exceeds the general maximum group size for a specified type of recreational experience in the ROS [Recreational Opportunity Spectrum]. The DEIS adds, "Large group size varies by LUD [Land Use Designation] and ROS." The result is that the DEIS accommodates large groups to a large degree over a large number of areas but does not address their compatibility with smaller groups in a sufficiently quantitative or otherwise detailed way.

3. **Explanation of Carrying Capacity Criteria.** Page 3-8 refers to the four kinds of carrying capacity criteria – ecological, physical, facility, and social. However, the DEIS fails to display meaningful and defensible data for all four of these criteria in all areas where groups of up to 75 people would be authorized.

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide 4
Again, the revised Tongass Forest Plan requires the FS to consider whether "[t]he affected ecosystem(s) have the capability to accommodate the expected kinds of activities and amounts of use without degradation of ecosystem composition and structure." (see revised Forest Plan at 4-41, REC122 II.4.4 (2)(a)).

It is very difficult to reduce authorized capacities once commercial interests have developed potential revenue expectations and have made capital investments accordingly. Therefore, the FS needs to be far more conservative in authorizing use levels, especially when there is insufficient demand justification for high numbers of up to 75 people per day and when there is so little research information on impacts on brown bear and other wildlife from such large groups going ashore on a daily basis.

4. **Management Area Size and Monitoring.** It is unclear in reading the DEIS how the public and agencies will be able to understand how the capacity limits will be monitored in such a way as to detect when established limits are excessive and to determine what corrective action is required. The DEIS discussion on page 3, Appendix D on project-specific monitoring does not appear to describe a sufficiently formalized method of testing the predicted effects once the plan is implemented. Instead the FS seems to be relying on outfitter/guides' reports and whatever informal or anecdotal comments other forest users happen to submit to the agency. The project-specific monitoring needs to be more proactive and structured to encourage users to provide comments on how the agency's decisions impact the quality of their wildland experiences.

There is also a need for the FS to commit in the EIS to monitoring the impacts of high numbers of people going ashore on bear and other wildlife habitat, and for explaining exactly how the FS intends to conduct such habitat impact monitoring.

The FS needs to describe in the EIS its procedure for bringing users together periodically to examine the results of monitoring the effects of its shoreline allocation decisions on people and wildlife and to make any necessary adjustments in these allocations from year to year.

5. **Areas Managed for Less than Maximum Social or Recreation Carrying Capacity.** It is not evident where in the DEIS there is a provision requiring that carrying capacities will be re-evaluated on a regular basis and adjusted based upon impacts resulting from actual use.

Moreover, it is difficult to see where in the DEIS the FS has avoided pushing capacities to their maximum limits in some areas. The DEIS indicates that the FS has, in a number of areas, done quite the opposite by maximizing use by large groups.

Appendix G—Response to Comments

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide

As pointed out in the BBMT's scoping comments, areas should also be managed for different capability targets based on group size, length of stay, and type of use. On of the measures that could be taken in this regard is for the FS to incorporate in the EIS a temporal provision in which certain days of each week would be publicly noticed as being closed to any onshore use by large groups. That way, the resident or non-resident who has planned their trip of a lifetime to hunt, fish, kayak, or otherwise recreate could schedule their trip on days when there is a common

public understanding that a large 75-person group will not be authorized by the FS to go ashore. This would afford a small party the solitude and quiet that people from all over the world have come to associate with Alaska wildland experiences.

Finally, the BBMT recommended that "some areas may be considered off limits for certain types of commercial activity and/or certain times of the year." The team suggested that "such restrictions may be applied when commercial activities or other human uses cause adverse impacts and reasonable alternative locations are available to accommodate the commercial use." It is not apparent where in the DEIS these recommendations are adequately addressed or incorporated. To the contrary, page 2-47 features an argument that precluding commercial use is not permissible under existing law. It is questionable whether this conclusion is as categorically correct as the FS indicates.

7. Nonresident Hunter and Hunting Guide Levels. No recommendation is more central to the concerns expressed by the BBMT than this one, yet there appears to be nothing in the DEIS that indicates that this significant issue has been addressed. For example whereas the BBMT proposed allowing the number of authorized brown bear hunting guides being reduced to no more than 20, the DEIS on page 3-113 only indicates a FS willingness to cap the number of bear hunting guides until the analysis (EIS) is complete. The future beyond that is left uncertain.

On September 4, 2002, Ken Post of the FS team for this EIS, indicated that the number of hunts or guides that the FS will permit is not reflected in the DEIS and that it would probably be addressed separately by a prospectus published through a special use permit administrative process. This statement seems to be confirmed in the last sentence on page 2-47 and comes as a disappointing surprise because the public was lead to believe by the FS that the EIS would lead to resolution of the significant issue of undue competition that arose and still exists among bear hunting guides authorized by the FS to operate on the ABC islands. If the issue could have been settled by a prospectus, one must question why the FS has not done so in the four or more years since the lead-up to this EIS began.

The FS is urged to act soon to resolve this issue, whether it is in the FEIS and resulting ROD or a prospectus and its ROD. If the FS does use a prospectus process to decide what the thresholds for bear hunting guides are to be, the agency needs to ensure that this approach does not simply lead to the same problem that has occurred in the past. Applicants for bear hunting guide permits have been dealt with one-at-a-time, with no established criteria in place to defensibly cut off the number of bear guide permits issued in any particular area.

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide

To cite just one area as an example of this shortcoming, No Name Cove at the entrance to Tracy Arm is designated in the FS's "preferred alternative 5" to accommodate onshore groups of 75 people up to every single day in "all seasons." Moreover this maximum allowance has been made in the absence of any demonstrated demand or critical analysis of the impacts of 75 people going ashore each day on the quality of experience of small parties of, for example, less than 6 people. There is also no meaningful assessment of the effects of 75 people per day on the habitat quality of shoreline inhabiting wildlife in this cove, such as Alaska brown bear.

As for demand, an observer was anchored in No Name Cove the nights of July 2 and 3 this past summer and noted about 8 to 10 boats anchored there at night. Daytime anchorage in the cove appeared to be largely limited to boats arriving and anchoring in anticipation of heading up into Tracy Arm the following morning. Even when the maximum number of boats were anchored in the cove for the evening, only a handful of people were seen going ashore. There was no evidence of a boat putting 75 people ashore. If the FS has evidentiary demand data to the contrary for this cove, it needs to display it in the EIS.

Page 3-15 suggests that such demand data do not exist for any area because it features the statement that "The largest guided group on the national forest reported in 1999 was 70 people from a tour boat. Most guided groups from tour boats range from 12 to 20 people in size." This raises a serious question as to how, based on such a low demand for 75-person groups, can the FS propose a "preferred alternative 5" with as many as 33 large groups "enclaves" and 14 "large group 15-percent areas."

Again, although these deficiencies need to be addressed for No Name Cove, that location is mentioned here only as an example of what the FS needs to do for all of the so-called "15-percent areas" and large group "enclaves" that it has featured under the decision alternatives.

6. Allocation of Use. A major deficiency of the DEIS is that the FS has lumped all guiding into one use category, so that the number of hunts or number of guides is not addressed at all. Moreover, the FS has figured carrying capacity in terms of group days, despite the BBMT's argument that the number of hunts makes much more sense for bear guiding.

If the Record of Decision (ROD) for this EIS is to meaningfully address use conflicts and not just accommodate 75-person groups, it needs to establish allocations between commercial and non-commercial use, and it needs to provide small business opportunities for residents of local communities within the immediate area.

Response to Comments—Appendix G

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide

7
8. Minimizing Disturbance to Bears. Only 13 pages (3-102 through 3-115) address the environmental effects of the alternatives on wildlife, and only 2.5 of these pages (3-112 to 3-114) address impacts on brown bear. The wildlife impact pages in general and specifically the brown bear pages feature descriptions of game harvest and of management practices that may help to mitigate habitat impacts. However, there is hardly any information in these pages that actually describes in sufficient detail the impacts on bears and other wildlife that can be expected to result from alternatives that accommodate numerous large groups, either daily or 15 percent of the days in a season.

It is incumbent on the FS to obtain essential impact data and information before proposing to unleash large groups of people on a daily basis. That simply has not been done yet.

It is unclear how the DEIS addresses and solves the significant issue of managing the number, timing, and location of bear and recreational outfitter/guides so as to prevent or minimize disturbances to bears and their habitats. Again, No Name Cove serves as an example. It is impossible to determine from the DEIS how the FS can conclude that allowing a party as large as 75 people to go ashore in that modest size cove as often as every day of the season cannot have significant negative impact on bears, especially when there is not even a temporal restriction as to the time of day or the days each week. Moreover, the DEIS acknowledges on page 3-112 a paucity of research findings in Southeast Alaska as to the impacts of human pressure on bears along shorelines.

9. Admiralty Island National Monument Status. Here again, the BBMT recommendations appear not to have been incorporated. There appears to be no assurance in the DEIS that the FS will complete the Comprehensive Admiralty Island Plan that the BBMT proposed to resolve significant land management issues and to bring the FS into compliance with the obligation for the agency to "protect" brown bear that is described in Section 503, of the Alaska Lands Conservation Act (ANILCA).

Similarly, the DEIS appears to afford no assurance that the FS is committed to providing funding and other assistance to the Alaska Department of Fish and Game (ADF&G) for its studies of brown bear populations, density, and behavior. However, results of such studies are essential to management decisions made by the FS relative to this EIS.

Finally, the FS appears to have disregarded the BBMT's recommendation that the agency restrict or prohibit long-term tent camps and shore-based utilities, attachments, or other support for floating camps or lodges.

7

7/9

Friends of Admiralty Island 12/30/02 response to Shoreline Outfitter/Guide

8
10. Effects of Private Lands. There is inadequate discussion of the BBMT recommendation that in establishing shoreline carrying capacity, it is essential to consider the effects of existing as well as reasonably foreseeable private inholdings. The DEIS simply says, on page 3-57, that "Any additional recreational development on private lands in the future would likely increase recreation use on the adjacent national forest." This is a significant issue that needs to be addressed in much greater detail in the EIS. It needs to be specifically indicated for each large-group area how and to what quantitative degree such private land development has influenced or is expected to influence the large-group allocations featured in each alternative.

11. Areas Meriting Special Attention. It is difficult to see where in the DEIS that the FS has identified the areas within designated Guide Use Areas (GUAs) that merit special attention. Furthermore, the FS does not appear to have explained its apparent assumptions that 1) users will spread out naturally throughout GUAs, 2) that these users will apparently be satisfied to spread out to avoid other users, and 3) that all areas in a GUA will support the same quality of experience. The BBMT advocated a monitoring plan that has built into it the testing of planning assumptions and the opportunity to make year-to-year adjustments in the FS shoreline use allocations that will be made in the ROD that results from this EIS.

12. Community Stability. It is not apparent in the DEIS how the FS has accommodated the BBMT's proposal to 1) allocate a certain number of group days in each area to businesses with less than a certain number of employees, and 2) allow for the gradual, slower-paced planning and development of tourism and related activities in rural communities by allocating, before carrying capacity is reached, a certain number of group days in community home ranges to locally owned businesses.

13. Socio-Economic Impact Analysis. The questions posed in the BBMT's letter do not appear to have been answered in the DEIS. They represent significant issues and need to be dealt with in the EIS.

14. Subsistence. The DEIS is deficient in explaining how impacts on subsistence have been considered in the FS's determination of carrying capacity.

In Closing. Again, Friends of Admiralty Island appreciates the chance to review and comment on the DEIS and look forward to the FS taking corrective action on the recommendations that members of the BBMT identified in the team's May 6, 1999 scoping letter to the FS.

Sincerely,



K.J. Metcalf
President

8

8/9

Appendix G—Response to Comments

01/08/2003 02:50:29 PM

Mary Beth Nelson

Areas

The following areas in the table, I have some familiarity with and am okay with them being listed as enclaves: Lake Eva Trail, Rodman Bay, Saook Bay, Hanus Bay. I would rather see a logged area like Peril Strait devoted to enclaves than more remote, unlogged areas like the East and West shorelines of Baranof Island.

Appendix B, pg 2 - Large Group Area Cards, Fifteen Percent Areas

I would not like to see Cosmos Cove promoted as an enclave. It is already heavily used by fishermen and private vessels. It's a favorite anchorage for exiting or entering Peril Strait.

General Comments:

1) The plan seems to give too much latitude to industry to grow. Once freedoms are given it's hard to take them away. Let's approach this development of the Shoreline Outfitter/Guide industry with more caution, combined with careful monitoring and repeated assessment.

2) I would like to see large group and fifteen percent areas enclaves located near large towns, but not in the community's historically favorite places. They should also use logged areas whenever possible. Let me state again, I would rather see a logged area like Peril Strait devoted to enclaves than more remote, unlogged areas like the East and West shorelines of Baranof Island.

3) I'm concerned about too many enclaves affecting bears and other wildlife. I think the Forest Service should be very sensitive to the habitation that occurs from enclave overuse. When this is happening (overuse) the area needs to be developed in such a way as to distance the people from the wildlife.

Better planning needs to happen for large group use. The FS needs to anticipate the need for viewing areas, find likely areas along heavily trafficked routes, and develop areas before bear habitation occurs.

4) Group size should be 10 or less.

Mim McConnell

Mim McConnell
Tongass Clearinghouse
617 Katlian St. #75-04
Sitka, AK 99835
907-747-2860
Fax: 775-244-5096
Email: mim@tongass.com
www.tongass.com

2/2

78

01/08/2003 02:50:29 PM

Mary Beth Nelson

To: MaryBeth Nelson/R10USDAFS@FSNOTES
cc:
Subject: Shoreline Outfitter/Guide DEIS comments

Bill Tremblay

01/08/2003 10:51 AM

Recreation/Wilderness Program Manager
USDA Forest Service
Tongass National Forest
(907) 772-5877
bremblay@fs.fed.us
----- Forwarded by Bill Tremblay/R10USDAFS on 01/08/2003 10:51 AM -----

To: <bremblay@fs.fed.us>
cc:
Subject: Shoreline Outfitter/Guide DEIS comments

"Mim McConnell"
<shelter.cove.publish
ng@worldnet.att.net>
01/01/2003 03:44 PM



The following are my comments, both specific and general, about the Shoreline Outfitter/Guide DEIS.

Specific Comments:

Chapter 3, pg 59 - Environment and Effects - Socioeconomics - Affected Environment - Community Profiles

- Baranof Warm Springs
The community of Baranof Warm Springs, although in the City and

Sitka, should have a profile in this section as it is so distinct, and distant, from Sitka, and sees so much Shoreline Outfitter/Guide activities. Or at least mention it in the Sitka section.

- Fort Alexander

The profile for PA is not correct in reference to the "mail float plane". Fort Alexander receives weekly mail/freight/passenger service via the M/V EVAK. There is also a regularly scheduled passenger/freight service provided by Harris Aviation. There are also now a number of lodges in the community.

Chapter 3, pg. 79 - Environment and Effects - Wilderness - Environmental Consequences - Alternative 4

"The following places may become more popular as substitute sites.....Red Bluff Bay, Gut Bay..."

These two bays are already very popular sites. Especially Red Bluff Bay.

Chapter 3, pg 129 - Environment and Effects - Other Environmental Considerations - Threatened, Endangered, and Sensitive Species - Affected Environment - Sensitive Plants - Table 3-35, Sensitive Plant Species, Alaska Region

Calder's loveage: the Latin name, I believe, has a "typo". It should be Ligisticum calderi, not salderi.

Appendix B, pg 1 - Large Group Area Cards, Table B-1. List of Large Group

Shoreline O/G EIS
2-0101
01/01/03

1/2

Response to Comments—Appendix G

Chichagof Conservation Council
PO Box 623
Tenakee Springs, AK 99841

January 2, 2003

Shoreline Outfitter/Guide Project
Attention Mary Beth Nelson
USDA Forest Service
204 Siginaka Way
Sitka, AK 99835-7316

Dear Ms. Nelson:

The Chichagof Conservation Council, based in Tenakee Springs Alaska, is a citizen group dedicated to conserving the intrinsic value of the Tongass National Forest. We believe that with proper stewardship, the forest can provide for our economic, material and spiritual sustenance. Our members are fisher/hunter/gatherers, commercial fishermen, loggers, retail business owners, commercial guides, retirees and people from many other walks of life.

We appreciate the opportunity to comment on the Shoreline Outfitter/Guide Draft Environmental Impact Statement. We have been concerned for sometime about the potential for damage posed by an unrestrained commercial recreation industry. Many of our members, including commercial guides, have been reporting user conflicts on local rivers for some time. We believe there is opportunity for economic expansion of the guided recreation industry. That expansion needs to be controlled and guided by input from affected local residents.

Commercial guided recreation on Tongass land is an important part of a sustainable Southeast economy. Commercial guided recreation on the Tongass depends on outfitter-guides being able to offer a unique wilderness experience. By its very nature, that experience is vulnerable to over-crowding, overuse and all the inevitable impacts of large groups (or many small groups) on wildlife, sensitive terrain, and other users.

Local small scale guides contribute to Tenakee Springs both economically and as members of the community. Their businesses depend on a low density of other users enabling them to offer a unique high-quality wilderness experience to their customers. In contrast, a shift towards large cruise ship based groups will only harm Tenakee, both by displacing local operators and by damaging non-commercial values.

Subsistence

The DEIS does not adequately address the issue of subsistence. For the citizens of Tenakee Springs, as well as for other small rural communities in Southeast Alaska, "subsistence" is not just a "buzz word" - it is our way of life. We rely heavily upon the old growth forest and its resources to sustain us. Fishing, hunting and gathering are all critically important to our way of life and every area in our vicinity from which we are displaced or which is adversely affected by tourism will have a drastic negative impact on our ability to feed our families. In view of the fact, we request that the Forest Service

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

Shoreline O/G EIS
2-8-0123
01/02/03

1/7

hold official subsistence hearings throughout the region to determine the effects of proposed regulations before the FEIS is completed. We additionally request that any new regulations be crafted in such a way as to protect those resources that the people of Southeast Alaska rely upon.

Regarding enclaves, the DEIS proposes several large group enclaves for Tenakee Inlet. Use levels are designated for each area according to the Land Use Development (LUD) of each area. Using the LUD ignores the actual condition of the land which, in several cases, is still undeveloped, unroaded and nearly pristine. The ROS class for all enclave areas other than Corner Bay and nearly all the rest of Area 04-12, Tenakee Inlet, should be Primitive or Non-Motorized Semi Primitive. ROS classes should reflect the current condition on the land, not the potential future condition if logging occurs.

Commercial operators are not going to make the investment to build infrastructure in an area that would be logged at some unspecified future date. Large group activities should be permitted only in areas already developed. Regarding 15% enclaves, nothing in the DEIS prohibits the 15% use from being on consecutive days of the season i.e. daily for 2-3 weeks of the salmon run for bear watching or fishing. 15% enclave permits should be issued for specific days of the week so non-commercial users can avoid the large groups.

Corner Bay

The proposed enclave at Corner Bay offers some potential for large group, small cruise ship activity, even though we feel enclaves farther from small communities should be developed first. Corner Bay is the most appropriate of the enclaves proposed for Tenakee Inlet included in Alternatives 3, 4 and 5. Corner Bay, with its extensive road system, offers good opportunity for wildlife viewing and photography, stream and lake fishing, and many other outdoor recreation opportunities.

Local subsistence hunters use Corner Bay heavily in the fall and early winter months. That use needs to be protected. Also requiring protection are the ancient petroglyphs located on the beach near the east boundary of the proposed enclave.

Crab Bay

The Crab Bay enclave is in a Timber Production LUD and is given an ROS classification of semi-primitive motorized/roaded modified. The area shown on the map for the Crab Bay enclave is in the unroaded, still nearly pristine area near the head of the bay. There is an abandoned Log Transfer Facility near the mouth of the bay that is roaded and modified. The anchorage there is not as good as the one at Corner Bay, but would be acceptable in the late spring through the early fall. There is a hardened, developed road and a rocky staging area appropriate to large group development. The head of Crab Bay is important for commercial crab fishermen and is heavily fished with pots during the summer and fall. There would likely be a conflict between fishermen and tour groups.

The ROS for the Crab Bay enclave allows ATV and high clearance truck use, which is entirely wrong for the unroaded head of the bay. The permit officer during the December 17 teleconference in Tenakee said she simply "wouldn't permit that". How could a permitting officer refuse to permit an allowed activity? The ROS class assigned allows 15 groups of 15-20 and the enclave is allowed to be 75 per group. This is a prime example of the USFS not having specific local knowledge of the site conditions and assigning an entirely inappropriate ROS class. The head of Crab Bay is a large tide flat and grassland. The river supports good runs of pink and chum salmon and is prime bear

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

2/7

Appendix G—Response to Comments

habitat. The area is important to local deer hunters. Large groups are entirely inappropriate here. The proposed enclave area should be a primitive ROS.

The LTFs within Corner and Crab Bays would be appropriate for a large group activity – one or the other, but not both.

Goose Flats

Middle, Upper and Lower Goose Flats and Goose Cove, located between Lower and Middle Goose Flats, are extremely important to the residents of Tenakee. This entire area is a very popular subsistence hunting, fishing and gathering place. Goose Cove is the best anchorage above Long Bay. It is extremely important to the local dungeness fishermen who use the anchorage daily through the summer and fall. Tenakee Springs has been on record for years in requesting protection of this area. At Tenakee's request the State of Alaska selected this area for a marine park, though it was not conveyed. This area, though in a development LUD, timber production and Modified Landscape, is still pristine. There is no onshore development of any kind. Like others already mentioned this area should also have a primitive ROS classification. Because of its importance to local interests, this area should be permitted for little or no shore-based commercial recreation activities. A large group enclave especially with a ROS that allows, even encourages, ATV use is totally unacceptable.

Saltery Bay

The Saltery Bay shoreline is Old Growth Habitat and Modified Landscape LUD. The uplands are timber production. The identified enclave area is partly very steep almost cliff like sloping down to the beginning of an extensive tidal grassland. The enclave area includes a portion of an old clearcut from the early 50s. The shoreline and grass flats are a fragile ecosystem that cannot stand up to the passage of large groups on a daily or weekly basis. Several local guides who depend on its relatively low daily use already use the river and flats. Encountering even 4-5 groups of 10-12 people would ruin the experience they have been selling. Saltery Bay is a favorite place for many Tenakee residents. Even though it has development LUDs, there has been little logging and there are no roads. TLMP limits group size to 50 in Old Growth habitat LUDs. Saltery Bay is not an appropriate place for large groups. The anchorage, while good, is small and crabbers fish the shoreline. It would be easy to overcrowd and ruin this wonderful place.

Trap Bay

Trap Bay is a legislated TTRA LUD II. The only development is a small cabin used by the Forestry Sciences Lab. The ROS class is Semi-Primitive-Motorized. It is wrong to give this nearly untouched area a motorized classification merely because the shore can be accessed by boat. The Standard and Guidelines for Semi-Primitive/Motorized states that the area is accessed to and through with traffic level C and D roads and frequent ATV use. None of this is in place in Trap Bay (nor would we want it to be). Trap Bay should have a primitive ROS class.

It's inappropriate to have a large group enclave in a LUD II because TLMP limits group size in LUD to 50. Trap Bay should be eliminated from the list of large group enclaves because it has rich known karst formations and likely many undiscovered formations that should be protected.

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

3/7

Seal Bay

The Forest Service inventory for Seal Bay in Tenakee Inlet is in error. There is currently no road in Seal Bay. There was some very small scale logging done in the head of Seal Bay in the 1960s but there was probably less than one half mile of primitive road, really more of a skid trail than a road. The remains of that skid road have been virtually obliterated. There is no way one can even walk that trail, much less drive any kind of vehicle on it. The designation of this area for motorized use is not appropriate and would undoubtedly lead to extensive damage to the inter-tidal areas. The whole of the Seal Bay drainage is at this time, for all practical purposes, pristine. It is already used extensively by sport and subsistence hunters and fishers, bear guides and local fishing guides and is of unusually high value as habitat for salmon, bears, deer and water fowl. Designation of this area as a large group area is simply not compatible with current uses and values.

Monitoring and Enforcement

The DEIS does not adequately address how the FS will monitor the effects of or enforce the provisions of the new regulations. The FS is incapable of adequately monitoring existing levels of use and enforcement of current FS regulations is so sparse as to be virtually ineffectual. The FS indicates that it intends to rely largely on permitted operators and ordinary citizens to monitor compliance with the new regulations. This kind of approach for a regulatory agency is both ludicrous and unworkable. Since the FS is unable to enforce and monitor its current regulations perhaps, instead of permitting vast amounts of additional use, it makes more sense to continue a moratorium on new permits until the FS can adequately address and fund its responsibilities in administering such a hugely expanded permit system.

Disproportionate Effects on the North End of the Tongass

This analysis includes only the Sitka, Hoonah and Juneau Ranger Districts. It should have included all Ranger Districts on the Tongass National Forest. The net effect of this analysis will be a disproportionate impact from the large-scale tourism on the north end of the Tongass National Forest. If this analysis is carried through to completion and a ROD is signed, an extremely loose permitting process will be available to large scale tour operators only on the north end of the Tongass, and no similar process will be available on the south end. In fact, the Final EIS will serve in effect to advertise places that are currently only known and used by southeast Alaska residents and small local outfitter/guides. This will lead to an unbalanced, inappropriate level of large scale tour operators from outside offering outfitter guide services on the north end of the Tongass. Our small local operators will be dealt a double blow – more users and hence a reduction in the isolated wilderness experience they are currently able to offer AND an unprecedented, disproportionate distributed of competition.

The potential for adverse effects to cultural sites has not been adequately evaluated.

The Section 106 review required of Federal actions as defined by the National Historic Preservation Act has not been completed prior to publication of the DEIS. We

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

4/7

Response to Comments—Appendix G

commend the Forest Service effort to inventory all large group and Enclave areas¹ and to eliminate most areas from the analysis when cultural sites are identified, however, since neither the prerequisite inventories nor the Section 106 process has been completed, the publication of the DEIS is premature. Tribes and others interested parties have not been consulted. Determinations of Eligibility and Effect have not been written and concurrence from neither the State Historic Preservation Officer nor the Advisory Council on Historic Preservation has been acquired. These are especially critical for those cultural sites identified within enclave and large group areas that have not been deleted (Chapter 3, p. 147). These processes are required by law and should have been completed prior to publication of the DEIS – especially since the results of this process determine, in part, which areas can even be included in the analysis.

One other comment regarding cultural resources and the Section 106 Process is appropriate here. This concerns the limitations in the DEIS placed on the “Area of Potential Effect” or “APE.” The DEIS argues that the “Area of Potential Effect” with regard to NHPA Section 106 review is limited only to large group and enclave areas. The justification for this is arguable. For example if multiple small groups go ashore at an archaeological site over the course of a short period of time, the potential for an adverse affect to that site (acute or cumulative) is no less, in reality, than if only one larger group went ashore. In fact, the way the DEIS is written, it would be quite easy for a small cruise ship with a capacity of 90 passengers to drop anchor in a bay and then send “small groups” (12 or less) ashore repeatedly – one immediately after another. The net effect of this would be equal to or exceed that of a single group of 75. Therefore, areas where repeated visits by small groups will be permitted should also be considered within the “Area of Potential Effect” and should be subject to full Section 106 review using the same filters and parameters as large group and enclave areas.

In addition to our comments above, we believe the FEIS needs to contain:

- 1) An analysis of demand for large groups in the Tongass.
- 2) Ways to limit large group use to certain days of the week so that other users may choose other days to visit an area.
- 3) A realistic analysis of the impacts of projected group use on a site by site basis, including projected needs for developed trails, boardwalks, docks, etc.
- 4) A clear outline of a monitoring program that will assess impacts on facilities, the ecology, and social components of use in the proposed enclaves and 15% areas and which schedules reevaluations of use based on monitoring results and public input based on those results.
- 5) A better analysis of use, perhaps dividing usage into:
 - A) Guided hunts.
 - B) Guided fishing in streams

¹ Though the discussion of Heritage Resources in Chapter 3 only mentions “large group areas,” I’m assuming the numbers reported in the DEIS and quoted within this letter include the “enclaves” as well. If they don’t, then there is an even bigger problem the one I describe here.

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

5 / 7

C) Guided wildlife/wilderness viewing

- i) Groups interested in an isolated or “primitive” wilderness experience (group size less than or equal to 6)
- ii) Groups interested in a somewhat isolated or “semi-primitive” wilderness experience (group size less than or equal to 24)
- iii) Large groups (group size between 24 and 50)
- iv) Very large groups (group size between 50 and 75)

If large and very large groups are to do more than stand or walk on the beach, our experience suggests that developed trails with boardwalks and gravel will be required due to impacts to the environment after very little use by commercial groups. This infrastructure needs should be fully disclosed in the EIS.

The effects of groups of all sizes should be analyzed for their impacts on wildlife, especially brown bear and mitigation measures included in the FEIS to reduce such impacts. Mitigation measures and management tools should include

- 1) A detailed process for determining the number of guides and hunts of brown bear.
- 2) Inclusion of a plan for managing bears and people in high bear-use areas such as salmon streams and estuaries.
- 3) A process for allocating use among the public users where conflicts are developing or exist. Such a plan should be in place now, before such conflicts escalate into unmanageable problems.
- 4) A detailed monitoring program evaluating the impacts of public use of these areas on bears and other biota and ecosystem functions that includes a scheduled reevaluation of use based on monitoring data and public input

In general, we support the need for and concept of the Shoreline/Outfitter Guide DEIS. Alternative 4 offers plenty of opportunity for economic growth. There should only be one, if any, large group enclaves in Tenakee Inlet (Area 04-12). Corner Bay is the best choice for Tenakee Inlet for a large group enclave. Kennel Creek in Freshwater Bay and Sitkoh Bay and False Island in Perli Straits offer better sites than does Tenakee Inlet.

Thank you for the opportunity to comment.

Respectfully,

John C. Wisenbaugh

John C. Wisenbaugh
President, Chichagof Conservation Council

Chichagof Conservation Council
Shoreline Outfitter Guide DEIS Comments

6 / 7

Appendix G—Response to Comments

Lower Chatham Conservation Society

January 3, 2003

Shoreline Outfitter/Guide Project

Attn: Mary Beth Nelson
USDA Forest Service
Tongass National Forest
204 Signaka Way
Sitka, AK 99835-7316

Re: comments on Shoreline Outfitter/Guide DEIS

Dear Ms. Nelson:

The Lower Chatham Conservation Society appreciates the opportunity to comment on the Shoreline Outfitter Guide EIS. LCCS is a group of conservation-minded people that have connections with Baranof Island and whose mission is to protect the integrity of the ecosystem of south Baranof Island. We feel that proper planning and management is necessary to ensure that wilderness values are protected, as well as to allow for areas for small- to mid-scale commercial guide use.

Because southeast Alaska has beautiful scenery and abundant wildlife, many people take advantage of the opportunity to visit one of the most spectacular temperate rainforests that is still in largely intact. Tourism is increasing in the Tongass National Forest and for everyone's benefit, proper management is key to maintaining the special qualities that make the forest a unique experience for visitor and resident alike. The Forest Service is to be commended on the progress we action it is undertaking to manage commercial tourism through this public process. However, there are some concerns with the plan that need to be addressed.

Overall, the DEIS was a very confusing document that took many hours of perusal and Forest Service personnel clarification to completely understand. There was lack of a clear explanation how many commercial users (actual numbers of people, as well as groups) could be in any given area. The plan did not map out the specific LUD and ROS classifications which would have made it much easier to determine how many users could be or expected to be in a specific place. A suggestion would be to depict the ROS and LUD on the use area maps that depict each management unit.

Carrying Capacity

During scoping for the Shoreline: RCCA of 2001, many letters expressed concerns that people had about carrying capacity. Many of these concerns were not addressed by the Forest Service in the RCCA, nor addressed when the same concerns continued to be

PO BOX 218 • PORT ALEXANDER, AK • 99836
PHONE (907) 482-2110 • EMAIL BACKLAGOON@AOL.COM

1/8

stated in the scoping comments for this plan. Because the carrying capacity is the foundation for numbers of commercial users, it is important that details and problems are worked out.

1. Discrepancy of group size according to the Shoreline RCCA and the Shoreline O/G DEIS

One fundamental difference of the Shoreline RCCA and the DEIS is that group size for the RCCA was designed with six people per group. Alternatively, in the DEIS, group size (except for large groups) varies and relates to LUD and ROS classifications, between 12 and 20 people per group. The design of the DEIS is now flawed by an allowance for greater people numbers while using carrying capacity figures based on an average of less people per group. To illustrate the allowable difference, in area 4-01b under the preferred alternative, the maximum number of commercially guided visitors during the summer season would be 5,940 people (297 group days x 20 people max in LUD). The maximum numbers for area 04-01b with a group size of 6 would be 1,782 (297 x 6). The difference in number of people is greater than 4,000 during the summer season just in that one GMU. It needs to be recognized that numbers of people do make a difference in determining social and ecological impacts. LCCS requests that the Forest Service recognize and rectify this large discrepancy in the amount of use between the RCCA numbers and the DEIS figures.

It is recognized that the RCCA and DEIS use the unit of a group for the sake of simplicity and flexibility, however, the extreme difference in numbers of people depending on guided or unguided that could be expected must be noted. In the RCCA, group size of unguided users was based on an average of three per group, and commercial users, six per group. The numbers of people in a commercial group is twice the amount of people in non-commercial groups (6 vs. 3). The DEIS under alternatives 1 and 3 (50% allocation) is actually allowing for twice the number of commercially-guided individuals than unguided persons. This disparity is an extreme over-allowance of use for commercial operators. While it may be a true generalization that commercial groups can be larger than unguided, the forest plan allows for no more than half the user capacity be commercial. For this reason, alternative 1 and 3 should not be considered.

2. Ecological carrying capacity largely disregarded
It naturally is human to think in terms of how we see ourselves knit into the web of life, thus tending to plan and manage for our own needs. The Forest Service has tried to place numbers and values on the social aspects of expectations and encounters, however, the Forest Service needs to place equal importance upon the ecological carrying capacity to ensure that wildlife has its space it needs also. It is important to consider the perspective and needs of wildlife when managing for the amount of use on the shoreline, so as to keep the "wild" in wildlife.

The recurrence of many people in wildlife-sensitive and remote areas can displace the wildlife, some of which they may have come to see. It is hard for the human to comprehend the compromises that an animal makes to quietly give way to two-legged

2/8

creatures. The changes of an area's wildlife use are not apparent to the casual onlooker, thus go unreported to the Forest Service.

Almost every bay, inlet, and port on Baranof Island is within a fast boat or plane ride from a community that offers sport recreation. Over time, the repetitive presence of people attracted to biologically rich areas, such as estuaries, will have a negative impact to the fauna in the area. For the brown bear, the estuary is food: new sedge sprouts in the spring, returning salmon in the summer and fall. To a bear that has been exposed to very few humans, what will happen when daily fly fishing trips or kayaks offload into their space? What does that do to the productivity and the natural history of that creature? Successful wildlife is dependent on certain criteria and habitat. Many scoping letters reminded the Forest Service of its responsibility to ensure that activities and use do not degrade the ecosystem.

In keeping with the spirit of the Forest Service's ROS guidelines, which are geared for human to human interaction, a spectrum for wildlife to human presence should be designed. An example would be designations of commercial use on a scale of no, low, medium to high with respect to distance from communities, LUD, and ecological sensitivity. Scientific studies need to be done to find where the high human/animal uses are occurring.

3. Permits, carrying capacity limits and illegal use

The plan should better explain the process for issuing permits. For instance, there is no explanation of how the Forest Service will handle permitting when the carrying capacity reaches maximum. If it does reach maximum, the Forest Service needs to illuminate how the permits are to be administered, i.e. who gets priority, limits to how many each operator is allowed, assurances that small local business owners will have access to areas they need, etc.

The Forest Service needs to assess the carrying capacity to determine whether or not its parameters are reflective of its characteristics and qualities. If the CC is determined to be more or less in the future, what is the process to change it?

Many commercial operators take clients to shore without permits illegally. Two ways to better ensure that this does not occur is through better monitoring and enforcement and by educating commercial operators, such as charter boats.

Ecological concerns

One of the many comments received during scoping for this plan was the almost universal request to the Forest Service to protect wildlife.

Alternative 4 is the best alternative to minimizing disturbance to wildlife sensitive areas with its lower numbers of groups. However, the large-group enclaves Three Hill Island (seabird rookery), Kelp Bay Middle Arm, Goose Flats, Sitkoh Bay, Lake Eva, Saook, Ushk Bay, and Poison Cove are situated in areas which will infringe upon sensitive habitat and thus should not be considered as enclaves or 15% use areas in the final plan.

3/8

Group size and enclaves

There should be a differential allowance made as to the length of stay during a visit onshore. All groups should not be considered equal due to length and duration of stay.

Group size should be limited to 10 on south Baranof due to the remote nature of the area and visitor expectation for such an area of little inhabitation and use. Local residents of Port Alexander and LCCS wish to see few small groups, preferably guided by local businesses. Many scoping comments desired a universal group size of six.

Area 04-01a and b do not have any 15% use area or enclaves. LCCS is supportive of no large group areas or 15% areas in Port Herbert, Lover's Cove, Port Walter, Deep Cove, Red Bluff Bay, Gut Bay, Red Fish Bay nor any other areas within these two management units. While these bays have scenic, wild and remote attributes, they have the potential for moderate to high use compared to the relatively low use currently taking place.

Groups as large as 75 with repetitive use over an area will require types of development such as, site hardening to prevent ground disturbance, toilet facilities, and docks. The DES is proposing too many sites such as these, and seventy-five people imaginably will inundate an area. LCCS recommends halving that number and creating two or three enclave/15% use areas in areas that have already seen site hardening such as LTP's or roaded areas. Start small and assess effects and needs as time goes.

To date there has not been much demand for this type of recreation. This selection of parcels from the forest, especially in remote, undisturbed areas has not been qualitatively proven necessary. Before the Forest Service allows such high-density recreation in remote areas, explanations and thoughtful planning need to be detailed with anticipated ecological impacts and development. This concept is new and should be approached with caution and reserved haste.

Wilderness ROS too high

Wilderness areas are vanishing across the world and as it becomes increasingly harder to find oneself removed from human contact, the experiences and values of wilderness are prized. For those that understand wilderness and plan to experience it in its full and true form, expect few if any encounters with other people. However, with some wilderness areas adjacent to saltwater, a common situation in the Tongass, wilderness travelers will invariably have significant visual and auditory contact with marine and air traffic.

Although not under the scope of the Forest Service, the wilderness ROS should be lowered to minimize the numbers of social encounters to be expected in a wilderness area. Many scoping letters asked the Forest Service to protect wilderness area attributes, such as opportunities for solitude, freedom from human activity, and developed facilities.

An important management goal should be to ascertain that permittees will be guaranteed an experience compatible with the ROS. A plan should be designed to provide a way for non-guided public to utilize areas knowing they will not run into large groups.

4/2

Appendix G—Response to Comments

to-local permit system or local operator-only zone within a certain distance from the community.

The carrying capacity of area 04-01b is 7 groups over an area of 8 main bays and three permanent communities of people. It is in this area that the carrying capacity numbers raise question. Especially during the summer with better weather and summer residents, any given day could find the carrying capacity met with folks being within minutes from their homes very near to the national forest boundary. Considering this is true, what measures would the Forest Service take to allow for up to 297 group days in the summer? In the summer this would allow for an average of around three commercial groups per day in 04-01b. The local guide needs would sufficiently be met around the south Baranof area. Note that this request is not an endorsement for any particular alternative, but a recommendation for LCCS's local community.

Alternative selection

The range of alternatives fails to give selections that have much variability in group numbers and enclaves. For instance, in areas 04-01b and 04-01a, the commercial allocation during summer is roughly 50 percent under alternative 2, 3 and 5. (The actual numbers of commercially guided individuals can be more than double, rather than 50%, due to the methodology of the RCCA, see section 1 under Carrying Capacity). The other two alternative selections in these management units are <51% allocation (alt. 1) or roughly 10% (alt. 4). Although these two GMLU's may be able to handle 50% commercial allocation, residents of Port Alexander and members of LCCS do not wish to see groups of over 10 people (some wanted only 6). The area of south Baranof is very remote and people wish that it remain that way. The visitors that come to Port Alexander usually come looking for a wilderness experience. The Forest Service must uphold the LUD and ROS characteristics; however, LCCS feels that group size should be smaller in order to maintain the remote wilderness appeal, although some of the land in the unit is designated remote to semi-remote recreation.

The alternatives 2, 3 and 5 have excessive numbers of enclaves and set limits too high that aren't consistent with public demand. The Forest Service should start with low numbers, such as the group days in alternative 4. At this point in time, commercial use of the Tongass is relatively low certain areas, greater in others. Rather than inundate areas that are not seeing heavy use now, the recreational use of the Tongass should start with low numbers initially; then as time passes, reassess effects and growth needs. People that come to explore, hike, photograph, and recreate on the Tongass tend to disperse themselves so as to enjoy the solitude that much of the forest provides. The values of solitude and lack of human development that are disappearing fast in today's world are a prized commodity that the Tongass provides and should thus be managed for recreational, ecological and spiritual enjoyment.

Already, areas on south Baranof are heavily used, and which use may go unreported. Mist Cove is used heavily by commercial, unguided and locals for hiking and sport fishing. The trail up to Cliff Lake in Deep Cove is being used frequently by tour operators and becoming damaged by foot traffic over soft ground.

6/8

Estuarine areas should be off limits to commercial groups during spring and during salmon runs. It has been observed at fish-counting stations manned with human observers that numbers of bears using the area decreases. On page 3-11.1, the statement "Recreation use that does occur... will not adversely affect wildlife habitat," is largely unstudied. The Forest Service does not have any data to support this claim and should manage these sensitive areas to avoid wildlife from becoming displaced or conditioned to human presence. The mitigation measures for human bear high use zones are, in theory, acceptable, however, necessary measures to prevent a Tier II area from becoming a Tier I area need to be designated and instituted.

Monitoring

The Forest Service has not proven definitively its objectives as to how it will monitor and evaluate wildlife sensitive areas and ecological health under this plan. Specific measures to keep commercial groups from entering into sensitive habitats such as nesting areas, salmon spawning streams, and estuaries have not been solidly addressed. Rather than ideological monitoring and mitigation measures in print in the DEIS, the Forest Service needs to restrict access to these sensitive sites. The Forest Service's directives are to protect these resources, and with careful management, this can be accomplished in accompaniment with commercial guiding and outfitting.

Areas in which enclaves will be established or moderate to high commercial activity occurs, the Forest Service needs to do a complete inventory and monitoring of resources before there is any chance of ecological alteration. Mitigation measures should be a priority in the prevention of negative ecological impacts.

Lack of demand data

While tourism is a high-ranking part of the economy of southeast Alaska, and it is important to provide a wide range of employment opportunities encouraging this industry, the Forest Service has not proven the public demand warrants such high increases in commercial guiding as alternative 2, 3 and 5 suggest.

Compared to the 1999 total group days, the alternatives range from the groups days doubling (alternative 4) to over 17 times (alternative 3) that year's level. Currently, the demand is not even meeting Alternative 4's limit, which would more than double the current use. On average the annual cruise ship industry has grown 10% annually over the past decade. If the visitor industry continues to grow at that pace, then Alternative 4 would satisfy the need, whereas 2, 3 and 5 would exceed the public demand.

Local residents and guides

LCCS is supportive of the promotion of healthy economies for the small local communities of the region. In the area of Port Alexander, a few family-owned commercial guiding businesses operate mostly via charter boat. The Forest Service needs to provide a way for these small operators to use the area around their community without being displaced by outside or non-local operators, whether it is by a preference-

5/8

Response to Comments—Appendix G

Permitting

The DEIS needs to elaborate on what the Forest Service will do when all permits for given areas are issued. Are the limits fixed, can they be changed to reflect a future need for more or less activity? Details of this process need to be well thought out, as well as engaging public input.

Many times when there is a fear amongst competitive ventures that permits are in limited supply, it causes a sudden flurry of activity to "get it while you can." The plan fails to mention how it will issue permits, i.e., on a first-come-first-serve basis to any operator until all are issued. Measures need to be taken to prevent companies from "hogging" more permits than they will be using. Small local tourism businesses need protections from this, as well as preferential opportunities to do business within close range to their local area. Since the USDA supports small business in rural communities, a preferential permit system to small-scale local commercial guides is a way to encourage development and sustainability of rural communities.

Under no circumstance should local or unguided users of the national forest need to fall under a permitting system.

Specific use of areas

LCCS has concerns about areas that have already experienced use that has contributed to trail erosion. Two trails have had damage: Falls Lake in Red Bluff Bay and Cliff Lake in Deep Cove. Many boats anchor in these bays and visitors wander up to the scenic lakes. The Forest Service must either close these trails to commercial groups or do trail maintenance to prevent further degradation. Since these sites are well-used and popular, trail rehabilitation in a minimalist sense needs to be instituted before any more commercial activity occurs.

Local fishermen are regular visitors to the national forest on a regular basis during the summer troll opening. Many people go ashore after a day's work or take a day off now and again to hike and explore. The area heavily used by this activity is from Patterson Bay, east Baranof, to Port Alexander. Mist Cove is regularly visited by locals, too.

Subsistence resources

Areas surrounding Port Alexander that are considered traditional subsistence gathering grounds need to be placed off limits or severely restrictive to commercial groups. The area from Poor Man's beach to Port Lucy is heavily used for hunting and gathering foods. Locals also travel up to Deep Cove to hunt. Red Fish Bay is used in the summer for subsistence sockeye salmon.

Lack of information and input solicitation

The Forest Service was good to extend the comment period. The town of Port Alexander suffered by not having a representative from the Forest Service pay a visit to explain the DEIS. Many people were very concerned about the plan and had many questions and misunderstandings that could have been answered.

Another negative aspect of the process for this DEIS was that it did not accept public comment. So much local knowledge can be gleaned from people in public workshops or informal hearings. Locals have much knowledge of what is happening around them and can tell stories of change they have seen over time. They are the eyes and ears of the forest. It is highly unlikely that this knowledge gets passed to the Forest Service. Many people that do not write letters said that had they had the opportunity to give oral testimony, they would have.

Thank you for accepting these comments and planning for future recreational endeavors.

Sincerely,



Anissa Berry-Frick
President

Appendix G—Response to Comments

Southeast Alaska Conservation Council

SEACC 419 6th Street, Suite 200, Juneau, AK 99801
(907) 586-6942 phone • (907) 463-3312 fax
www.seacc.org • info@seacc.org



Shoreline Outfitter/Guide Project
Attn: Mary Beth Nelson
USDA Forest Service
Tongass National Forest
204 Signaka Way
Sitka, AK 99835-7316

January 3, 2003

Re: comments on Shoreline Outfitter/Guide DEIS

Shoreline O/G EIS
2,9-0143
010903

Dear Ms. Nelson:

The following comments relate to the Shoreline Outfitter/Guide Draft Environmental Impact Statement (DEIS) prepared by the Forest Service. They are submitted on behalf of the Southeast Alaska Conservation Council (SEACC).

SEACC is a coalition of eighteen volunteer citizen conservation groups in fourteen communities across Southeast Alaska, from Ketchikan to Yakutat. SEACC member groups and individual members directly affected by this planning decision are from Haines, Skagway, Juneau, Angoon, Tenakee Springs, Gustavus, Hoonah, Sitka, Port Alexander, Kake & Petersburg. SEACC's individual members include commercial and sport fishermen, Alaska Natives, tourism and recreation business owners, small-scale high-value added wood product manufacturers, hunters and guides, and Southeast Alaskans from all walks of life. SEACC is dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while providing for the sustainable use of our region's resources.

This planning action is important to all Southeast Alaskans. Commercial recreation and tourism play an important economic role in many Southeast Alaskan communities. Moreover, the extent and quality of recreation opportunities enjoyed by local residents are a central reason why many live here and rate their quality of life so high. As noted by the Forest Service, "the breadth and quality of recreation opportunities for local residents may be as important in generating incomes ... as are commercial tourism and recreation operations catering to visitors." DEIS at p. 3-63.

Given the Tongass National Forest's position as the only marine forest in the National Forest System, and one of the world's rarest ecosystems, the unique wildness, solitude, and remoteness sought after by both local residents and visitors, and the "newness" of large-scale recreation planning on the Tongass, all of us share an interest in a successful outcome to this planning effort. We greatly appreciate the Forest Service's effort to plan

ALASKA SOCIETY OF AMERICAN FOREST DWELLERS, Peter Butler • ALASKANS FOR JUNEAU • CHICHAGOF CONSERVATION COUNCIL, Thelma
CUSTOMARY & TRADITIONAL CATHING COUNCIL OF KAKE • FRIENDS OF BEARDS BAY, James • FRIENDS OF GLACIER BAY, Guineo
JANUARY 3, 2003
COALITION, Petersburg • LISIANSKI INLET RESOURCE COUNCIL, Portau • PRINCE OF WALES CONSERVATION LEAGUE, Craig • SITKA CONSERVATION SOCIETY
TONGASS CONSERVATION SOCIETY, Ketchikan • YAKU CONSERVATION SOCIETY, Juneau • WANGELL RESOURCE COUNCIL • YAKUTAN RESOURCE CONSERVATION COUNCIL
printed on recycled paper

for recreation and tourism use on the Tongass, reduce conflict between users, and minimize impacts to Tongass fish, wildlife and other natural resources. We can not, however, support the Preferred Alternative or the 'flying blind' management approach it adopts.

I. General Comments

There are several underlying deficiencies with the DEIS that the Forest Service must correct before authorizing large shore parties at frequent intervals at a multitude of designated sites. These include: 1) providing definitive data that shows why there is a public need to authorize such large groups so often and in so many areas; 2) adequately describing, evaluating, and mitigating the effects of the proposed action on brown bears and other wildlife; 3) shrinking the size, number, and locations proposed for large groups to comply with TLMP; 4) fixing problems with the Forest Service's recreational carrying capacity; 5) committing to a more proactive monitoring plan that can meaningfully assess the effectiveness of proposed mitigation measures and the accuracy of assumptions relating to carrying capacity; and 6) committing to a collaborative and adaptive management approach for assessing and adjusting capacity numbers to reflect on-the-ground effects on a regular basis.

Some of these flaws are particularly systemic and primarily stem from the application of national recreational guidelines to this northern Tongass planning analysis. Clearly, these national guidelines need to be tailored specifically for the Tongass.

Other shortcomings are caused by the Forest Service's incorrect interpretation and application of the standards and guidelines adopted in the programmatic revision to the Tongass Land Management Plan (TLMP). Correcting these errors is necessary to meet the purpose and need for this project: to provide comprehensive, consistent direction for managing commercial recreation use within the analysis area consistent with TLMP.

These errors range from the failure to apply the adaptive management approach directed in the 1997 Record of Decision adopting the revised TLMP to inconsistencies with the Recreation Opportunity Spectrum (ROS) standards for various Land Use Designations (LUD) applied in the recreational carrying capacity analysis.

Additional shortcomings relate to the adequacy of the site-specific analysis contained in the DEIS. For example, although each of the Unit Area cards in Appendix A contain a short statement regarding the absence or presence of commercial recreation use in a Use Area in 1999, the Forest Service fails to spell out exactly what that level of use was.

Although Table 3-5 in the DEIS (at p.3-21) identifies the number of group days for commercial use in each of the Use Areas, it fails to specify the number of individuals comprising these groups. This is particularly significant because the Preferred Alternative generally proposes over a 700 percent increase in the number of existing groups per day for the Analysis Area as a whole. While the Forest Service mentions several 'hotspots' where use is nearing or at capacity, the DEIS fails to inform reviewers exactly what the level of use in those areas was in 1999 or compare those to proposed levels. This is of

2 / 32

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

particular concern for those proposed use areas situated in some of the most prime and productive brown bear habitat in the analysis area.

Instead of following the adaptive management approach called for in the Record of Decision for the 1997 Revised Tongass Land Management Plan (TLMP), it appears the Forest Service is setting up a management framework without detailing how it will test the accuracy of the predicted effects or address known and unknown 'hotspots' in the future. The agency's reliance on its separate Special Use permit authority fails to provide a meaningful opportunity for the agency, outfitter/guides, or the public to address the most fundamental assumption at issue – the carrying capacity of the affected forest lands.

Given the paucity of information relating to demand, unguided use, and the effects of large groups (21 to 75 people) on forest resources, we recommend that the agency adopt a management framework that allows for substantially smaller increases in existing use levels over the near term (1 to 2 years), and provides for updates and adjustments as new information becomes available. We believe an adaptive approach like this, if combined with a formalized method of monitoring sufficient to allow for the effective testing of plan assumptions, is consistent with providing for community stability, treating all commercial users equitably, and maintaining the breadth and quality of unguided recreational use opportunities in the area.

After 5 years of preparation, we anticipate this planning process will carry substantial precedential value elsewhere on the Tongass. For these reasons, our comments focus in part on the nuts and bolts of this planning process, as well as provide specific comment on proposals for recreation and tourism development in areas of special importance to SEACC members, member groups, and local communities. We look forward to the Forest Service taking corrective action on the deficiencies we identify in these comments and for a successful completion of this planning process for the analysis area.

II. Issue Specific Comments

A. Are National Recreational Planning Guidelines Appropriate For The Tongass?

The Forest Service proposes to use this DEIS to determine the carrying capacity for recreation use for Use Areas identified within project area, the amount and types of commercial use allowed consistent with that carrying capacity, the type and location of areas where large groups can occur, mitigation measures to reduce user conflicts and resource impacts, and establishment of a monitoring program. To achieve these objectives, the Forest Service relies on planning strategies developed for national forests in the lower-48. Take the Recreational Opportunity Spectrum (ROS) classes for example.

From reading these management guidelines, it is obvious they were designed based on the assumption the primary means of access to national forests was by road or trail. As recognized by the Forest Service in the DEIS, however, "The marine waters flowing

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

3 / 32

between islands serve as the 'road' to this national forest" and access is typically by motorized boats and floatplanes. See DEIS at 3-14. We disagree with the agency's practice of reducing the ROS class for a particular location from primitive or semi-primitive non-motorized to semi-primitive motorized simply because the typical means of transportation to access points to most recreation spots within the planning area is by motorized boat. The fact that motorized boats are used to access state-controlled tidelands fails to justify classifying the adjacent national forest uplands as providing motorized recreation opportunities. Not only are many of these locations also accessible by non-motorized vessels, such as kayaks, but once a person (or group) reaches national forest land their mode of access is typically by foot.

We are particularly concerned about the Semi-primitive Motorized ROS classes' assigned Trap Bay and Kadashan in Tenakee Inlet and Damp Marker, Pinta Cove, Fox Creek, and Big Shaw Island. This ROS inventory classification is inconsistent with special management criteria applied in 1990 by Congress to these "roadless [lands] to retain [their] wildland character" in perpetuity. In particular, there is nothing within the Semi-primitive Motorized ROS classification that prohibits authorizing use of ATVs on these Congressional-protected wildlands, with potentially devastating consequences to stream banks, river beds, and wetlands.

For this reason, we request the Forest Service to take a hard look at tailoring the basic management assumptions contained in the national recreational planning guidelines to the Tongass specifically. Such an approach could both maximize the type of recreational opportunities sought by visitors and local residents alike, as well as the type of experience a majority of the local guide and outfitters try to provide their clients.

B. Inconsistencies with TLMP

1. TLMP LUDs are Permissive not Mandatory.

Both the DEIS and recreation carrying capacity analysis treat the ROS classes for the LUDs adopted in a particular Use Area as the deciding factor in determining appropriate carrying capacity or level of permissible development. This approach conflicts with, and misunderstands, TLMP.

The Forest Service convinced the U.S. Supreme Court in *Ohio Forestry Assoc. v. Sierra Club* that forest management plans that allocated lands to timber production did not direct any specific outcome at the project level. Consistent with the agency's position in court, the 1997 TLMP ROD adopted an adaptive management approach for the Tongass, and it recognized the flexibility inherent in the TLMP allocation decisions, including ROS classifications. See 1997 TLMP ROD at 1, 42. In response to comments regarding the effect of TLMP on recreation and tourism, the Forest Service made clear "The Forest Plan is a programmatic plan, and does not make site specific decisions. These decisions are made at the local level when projects are considered. Specific concerns for

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

4 / 32

Appendix G—Response to Comments

in attracting recreationists and tourists and in meeting their expectations.”). Again, if approved actions in some Use Areas increase the level of development that is the time to adjust the ROS classification to a more developed class.

2. *Recreational Carrying Capacity Analysis Misinterprets TLMP.*

Both the 1998 and 2001 Recreational Carry Capacity Analyses (RCCA) includes tables purporting to identify TLMP ROS classifications for the various Land Use Designations (LUD) in the planning analysis area. This is significant because, under TLMP, the agency is directed to manage land for the existing ROS class until use or approved activities result in changes to the ROS to a more developed classification. See TLMP at p. 4-42. Our review of these tables identified the following problems with the descriptions of ROS settings applicable to various LUDs:

- The ROS class for the Old-growth Habitat LUD is identified as “Semi Primitive.” TLMP, however, explains that this LUD “Generally provide for semi-primitive ROS settings” TLMP at 3-80. Consequently, it is entirely possible that the site-specific analysis required for this planning decision results in a determination that a particular land area within an Old-growth Habitat LUD possesses the physical and social attributes necessary to reasonably meet the requirements for a less developed ROS classification then identified in the DEIS. Seal Bay and Salsary Bay in Use Area 04-12 provide examples of Old-growth Habitat LUDs that reasonably meet the physical and social attributes for a Primitive ROS setting.
- The ROS class for LUD IIs is identified as “Semi-Primitive.” TLMP states that the primary objective for this LUD is to “Manage recreation and tourism use and activities to meet the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated by the Primitive and Semi-primitive [ROS] classes.” TLMP at p.3-90 (emphasis added). Trap Bay (Use Area 04-12) and Fox Creek are good examples of proposed Large Group Areas in LUD IIs that are classified in this DEIS as having a Semi-primitive Motorized ROS but reasonably meet the criteria for the less-developed Primitive ROS.
- The ROS class identified in the RCCA for the Scenic River LUD reads “Existing unless scheduled activities may cause a change.” In listing the objectives for this LUD, TLMP directs the agency to manage recreation and tourism use and activities to meet the desired ROS class for this LUD -- generally Semi-Primitive. TLMP at p. 3-104. Like the Old-growth Habitat LUD, a reasonable interpretation of this language would be that some Scenic Rivers may possess Primitive ROS classifications. The Kadasan River is a perfect example. TLMP found that the entire Kadasan River met the criteria for classification as a Wild River. See TLMP, Appendix E at p. E-73. Consequently, the Forest Service should adopt the Primitive ROS classification for this Scenic River LUD in this project analysis.
- As noted in the RCCA, the ROS class identified for the Scenic Viewshed LUD is the existing ROS unless scheduled activities cause a change; such approved changes could reduce the recreation opportunity to the Roaded Modified ROS.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

6/32

communities, businesses, resources, etc., can be specifically addressed at this site specific level.” TLMP FEIS, Appendix L at L-78.¹

Although the TLMP FEIS and revised Forest Plan provide criteria for assigning ROS classes for the various LUDs, the Forest Service never applied or identified a specific ROS class to lands allocated under various LUDs by TLMP. Consequently, the appropriate ROS class for particular inventoried recreation places was never subject to public review and comment until this site-specific planning process. For the TLMP revision, the Forest Service relied on a Forest-wide inventory of recreation places “using the principles of the ROS” See TLMP FEIS at p. 3-126. While the Forest Service provided a map of the inventoried recreation places in the TLMP map packet, neither TLMP nor this DEIS identify the precise locations of the various inventoried ROS classes.

While the Use Area and Large Group Area cards in Appendix A and B of the DEIS list the ROS classifications applicable to an area, none of these cards specifically identify the basis for selection of specific ROS settings for particular areas. All the DEIS contains is a table of the amount of different types of ROS available by Use Area. See DEIS, Table 3-3 at p.3-12, 13. Unfortunately, the DEIS does not explain how these amounts were derived for each Use Area. Of particular concern is the absence of any spatial context provided for this information (e.g., a map). The Forest Service needs to provide this critical information and give reviewers the opportunity to comment on the appropriateness of specific ROS classifications that the agency intends to apply.

Given the generally broad range of the ROS classifications assigned to many of the LUDs by TLMP, it is imperative that the Forest Service take a hard look at whether the ROS classifications recommended by reviewers for specific areas in this analysis area reasonably meet the physical and social setting requirements for the proposed ROS settings. If so, then the ROS settings for particular lands should be adjusted. If not, the Forest Service needs to provide a site-specific explanation for why the recommended setting requirements were not reasonably met at particular locations.

Although the 2001 RCCA (at p. 8) claims, “the most primitive ROS class held the most weight” in the analysis, we identify several instances below where proposed Large Group Sites reasonably meet the criteria for a more primitive, or less-developed, ROS class. We recommend that in adopting ROS classifications for this project, the Forest Service err on the side of protecting the type of recreation opportunity that most visitors and residents wish to experience – the least developed ROS classification reasonably met by the physical and social attributes for given ROS standards. See TLMP at 3-141 (“Past and current studies indicate the main attractions for recreationists and tourists include scenery, wildlife, feelings of remoteness, and a sense of vastness. These trends are likely to continue. The marine and undeveloped character of the Forest plays an important role

¹ In *City of Tenakee Springs v. Block*, the court determined that “The Tongass Plan is a programmatic EIS. It provides management direction and general guidelines for the Tongass Forest.” *City of Tenakee Springs v. Block*, 778 F.2d 1402, 1406 (9th Cir. 1986). “The land use designations are not mandates. That is, land use designation III does not require, but only allows, timber harvesting and road construction.” *Id.* at 1410. SEACC's Comments on the Shoreline Outfitter/Guide DEIS January 3, 2003

5/32

Response to Comments—Appendix G

The management prescriptions for this LUD, however, specify that “In those areas identified as inventoried Recreation places, seek to maintain the existing ROS setting.” TLMF at p.3-131 (REC122.B.). The area proposed for an enclave in Port Houghton, an inventoried Recreation place, illustrates our concern. According to the supplemental DEIS issued in May 2002 to determine the wilderness eligibility of Tongass roadless areas, this area provides primarily primitive and semi-primitive recreation opportunities and contains “vast opportunities for solitude and primitive recreation.” SDEIS, Appendix C1 at p.C1-593, 594. The area definitely qualifies for a Primitive ROS setting and the Large Group Area proposed in this DEIS is inconsistent with that ROS classification.²

- In describing the ROS class for the Modified Landscape LUD, the table in the RCCA reads, “Existing unless scheduled activities cause a change. Change to Semi-primitive Motorized, Roaded Natural or Roaded Modified is allowed.” While generally correct, this interpretation ignores the specific objective for this LUD included in TLMF to “Avoid changes to semi-primitive non-motorized ROS settings when feasible.” TLMF at 3-135. The table, however, leaves out an important caveat imposed by TLMF in the management prescriptions for this LUD: “In those areas inventoried as Recreation places (such as Goose Flats, a proposed enclave in Use Area 04-12), seek to maintain the existing ROS setting.” TLMF at p. 3-140. Given this portion of Use Area 04-12 lacks any motorized trails and is completely roadless and no or infrequent sights and sounds of human activity are present, we contend the appropriate ROS classification for this special area is Primitive.

- The table in the RCCA describes the ROS for the Transportation/Utility System LUD as “Manage changed setting with appropriate ROS guidelines.” (emphasis added) This statement is correct only so far as it goes. TLMF also directs that until a transportation or utility system is constructed the agency must follow the management prescriptions (and ROS class) consistent with the initial LUD. TLMF at 3-158. When added to the general prescription that the Forest Service must manage for the existing ROS class until approved activities reduce the appropriate classification, it is clear that the appropriate ROS depends upon existing, not anticipated, ROS classes within this LUD. The enclave proposed at Katzeihin (Use Area 01-01) provides a good example. TLMF has identified a proposed road corridor through this Use Area for decades. Even though Governor Murkowski recently announced his decision to re-start the NEPA planning process for Juneau Access Project, many remain unconvinced that a highway is the most economical or efficient way of improving access from Juneau to northern Lynn Canal. Until the highway is actually constructed, however, Katzeihin should be managed consistent with the Semi-Remote Recreation LUD.

² For the record, we remind the Forest Service of the ongoing appeal of the district court decision that overturned the final 1999 TLMF decision. That decision modified the 1997 TLMF by changing all the development LUDs in 18 special areas of longtime importance to Southeast Alaska (including the Scenic Viewshed LUD at the proposed Enclave in Port Houghton) to non-development LUDs, such as the Semi-remote Recreation LUD adopted for this portion of Port Houghton. A decision is expected soon.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

3. The Group Sizes used in this analysis are inconsistent with TLMF.

The 2001 Recreation Carrying Capacity analysis (at p.9) explains that the social encounters indicator for each ROS class “is a vital part of the ROS classification, and is critical to analyses of recreation carrying capacity” Despite the range of ROS classes contained in the analysis area, the DEIS only identifies three group sizes: a) groups from 1 to 12 people; b) groups from 12 to 20 people; and, c) large group sizes ranging from 21 to 75 people. See DEIS at 3-28, 29.

For the record, we object to the third group size used in this DEIS – groups ranging in size from 21 to 75 people. First, we note that while the largest group reported to the Forest Service in 1999 was 70 people from a tour boat, “groups generally have fewer than 12 people” DEIS at p. 3-15. In fact, the DEIS reveals that based on commercial use data reported from 1997 to 1999, the average group size is only six people. Id. While it makes sense to design a management framework that recognizes the probability of some increase in demand for larger group sizes, we question the reasonableness of using this single reported incident to justify the agency's Preferred Alternative, which proposes as many as 33 large group ‘enclaves’ and 14 large group ‘Fifteen-Percent’ areas.

There is no demonstrated public “need” or demand for this level of Large Group use. The DEIS also lacks an adequate assessment of the effects of such group sizes on existing recreational opportunities or shoreline habitat, particularly brown bear habitat. In its recently adopted Northern Southeast Area Plan (NSEAP), the Alaska Department of Natural Resources (DNR) addresses the relationship between the Area Plan and the Forest Service's Shoreline Outfitter/Guide planning process. DNR notes that the large group areas proposed by the Forest Service “are likely to have future development such as trails, mooring buoys, docks, and toilets, associated with them to mitigate the impacts of larger groups on the forest resources.” NSEAP at p.2-35. The DEIS violates NEPA by not identifying the type, location, and effects of these reasonably foreseeable developments on forest resources.

The various LUDs adopted in TLMF require the Forest Service to consider a number of additional group sizes in this analysis. For some LUDs (e.g., Old-growth Habitat and LUD II), the maximum number of users per day allowed by TLMF is 50, not 75. For the Remote Recreation and Wild River LUDs (see II. above) the maximum users per day allowed by TLMF are 24, not 75.

As a result, the Forest Service needs to develop additional party size groups: less than 12 people (Wilderness LUD); 12 to 20 people (Semi-Primitive ROS settings outside of Wilderness); up to 24 people (Remote Recreation and Wild River LUDs); and up to 50 people (LUD II and Old-growth Habitat LUDs).

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

Appendix G—Response to Comments

4. Enclaves in Semi-Remote Recreation LUDs

According to TLMP, the management prescriptions for this LUD allow enclaves while the standards and guidelines for Semi-Primitive ROS settings outside of Wilderness areas generally limits group sizes from 12 to 20 persons. Although the Forest-wide standards and guidelines limit parties greater than 20 people for up to 15% of the primary use season, the management prescriptions for this LUD allow Enclaves without reference to such a use level restriction.

TLMP only defines the term “enclave” by explaining that it refers to “concentrated recreation and tourism developments.” The DEIS defines an “enclave” as “areas where large groups can occur on a regular basis throughout the season”; “Fifteen-Percent Areas are places where large groups can occur only on an occasional basis (for less than 15 percent of the primary use season.” DEIS at 2-2, 2-3. Clearly both Enclaves and Fifteen Percent areas allow for “concentrated” activities.

It is unreasonable for the Forest Service, however, to create a conflict or contradictory direction between the management prescription for this LUD and the ROS standards and guidelines by defining “large groups” as containing from 21 to 75 people. See DEIS at p. 3-26. In particular, the Forest Service lacks actual demand data to justify this size of a group.

Instead, we request the Forest Service to read the management prescriptions for this LUD consistently with Forest-wide standards and guidelines. Such an interpretation would only allow large groups in Semi-remote Recreation LUDs on a regular basis (e.g., an Enclave as described in the DEIS) if the area’s ROS currently is more developed than the Semi-primitive Motorized ROS classification. Under this approach, it might be appropriate to designate a Semi-remote Recreation LUD with at least a Semi-primitive-Motorized ROS as a Fifteen-Percent Area but not an Enclave, if physical site conditions can tolerate this level of use and local recreational and subsistence use is unaffected.³ Such a reading is consistent with both TLMP’s management prescriptions for this LUD and the Forest-wide standards and guidelines relating to party sizes for various ROS classes. Enclaves could be permitted consistent with TLMP within Semi-primitive Recreation LUDs where the existing ROS class is more developed than the Semi-primitive Motorized ROS.

C. Problems with Recreational Carrying Capacity Analysis

In addition to the ROS classifications applied to the various LUDs, the RCCA raises some serious questions.

1. Did TLMP assess ROS for each LUD?

³ For the record, this statement does not assume that 75 people are the appropriate cap for Large Group sizes.

SEACC’s Comments on the Shoreline Outfitter/Guide DEIS January 3, 2003

The 2001 RCCA states, “The Forest Plan assesses recreation and tourism resources by assigning a range of appropriate recreation settings for each LUD using the Recreation Opportunity Spectrum settings.” While we agree that TLMP assigned ROS settings for each LUD, by referring to each LUD this statement implies that TLMP assessed the recreation opportunities specific to each inventoried recreation place allocated to the various LUDs. We disagree; this programmatic forest plan never even identified the recreation opportunities provided by the inventoried recreation places. Instead, TLMP only ‘assessed’ the recreation opportunities by LUD group (intensive development, moderate development, natural setting, and Wilderness).⁴

According to the ROS Users Guide (at p.15), the Forest Service is suppose to inventory a forest “using the [ROS] criteria independently of any area designation.” Consequently, it is very important for the Forest Service to use this project level review process to address the ROS classifications for inventoried recreation places on the northern Tongass ‘independently’ of any LUD designation allocated by TLMP. More specific recommendations for individual areas are provided below.

2. What exactly does ‘optimal carrying capacity’ mean?

According to the 2001 RCCA (at p. 11), the Forest Service selected “optimal carrying capacity rather than a maximum capacity because it involves the concepts of quality and values along with numbers.” The RCCA, however, never defines exactly what the difference is between ‘optimal’ and maximum or minimum capacity. Please clarify.

Instead of the term ‘optimal’, the ROS Users Guide uses the term ‘practical maximum.’ Are these two terms intended to be synonymous?

According to the ROS Users Guide (at p. 34), ‘practical maximum’ is distinguished from ‘maximum theoretical capacity’ as follows:

“... while this ‘maximum theoretical capacity’ may provide a theoretical upper limit, it seldom represents a realistic or ‘practical maximum’ because of usable versus unusable acres, weekend versus weekday use, occupancy rate, and the like. In this view ‘practical maximum capacity’ is the effective upper limit because it accounts for factors which are always present and significantly affect recreation participation patterns.”

The 2001 RCCA never explains precisely what factors it considered in determining the ‘optimal capacity’ for the analysis area. For example, while it notes (at p. 14) that “Much of the land in the analysis area is functionally unsuitable for onshore recreation” and “The majority of the coastline is rugged and rocky, so easy access is limited primarily to

⁴ See TLMP FEIS, Table 3-45 at p. 3-130 (Forest-wide recreation place acre summary); Table 3-47 at p. 3-133 (acre summary for recreation places important for marine recreation); Table 3-48 at p.3-134 (acre summary for recreation places important for hunting); Table 3-49 at p. 3-135 (acre summary for recreation places important for fishing); Table 3-50 at p. 3-137 (acres and percent of recreation places important for tourism by LUD group).

SEACC’s Comments on the Shoreline Outfitter/Guide DEIS January 3, 2003

protected bays and beaches," it never identifies the resulting coefficient developed to reflect actual conditions in the analysis area. While the Large Group Area cards in Appendix B mention whether commercial use occurred or not in a particular area in 1999, no information is provided as to the pattern of that use (e.g., whether it's every day during the week or season). In fact, the number of commercial group days reported in the DEIS (at Table 3-5 at p. 3-21) for each Use Area by season reveals that the Forest Service is apparently treating the "maximum theoretical capacity" as the "optimal capacity." Unfortunately, such an approach fails to account "for factors which are always present and significantly affect recreation participation patterns." Thus, it is impossible for DEIS reviewers to meaningfully evaluate the validity and appropriateness of the "somewhat subjective" determinations reached by the Forest Service in selecting the proposed carrying capacity.

3. Is it reasonable to assume that the 'ecological carrying capacity' for the analysis area is not expected to be a 'limiting factor'?

While the 2001 RCCA acknowledges that ecological carrying capacity is an important consideration, it makes this assumption (at p.10-11) based on past monitoring. This conclusion may be reasonable in the context of past recreational use levels, but is it reasonable given the proposed 700% increase in some Use Areas, including the location of enclaves at the head of productive estuaries that are heavily used by brown bears? Areas of particular concern include Sitkoh, Saook and Ushk Bays, Poison Cove, Goose Flats, and the West Arm of Kelp Bay.

4. What is the basis for allocations of commercial groups in Use Areas by seasons?

The DEIS explains that the agency identified recreation seasons "to provide a temporal measure for recreation management and use." This makes sense given the different levels and type of uses that occur during the year. For example, summer season is the longest and most heavily used by commercial users and brown bear outfitters are restricted by season limits in the spring and fall.

The 1998 RCCA (at p. 11) provided a Summary of Carrying Capacity by Use Area in Group days for each season. While the Groups At One Time (GAOT) figures were the same for each Use Area across all seasons, the number of Group Days calculated per Use Area differed based on the number of days calculated for each season. We could find no information in the analysis explaining how the specific length of seasons was calculated for each Use Area. In contrast, Table 3 in the 2001 RCCA only summarizes capacity in terms of GAOT without reference to specific seasons. The recreation seasons identified in the DEIS count the number of days for each season without reference to any differences among particular Use Areas. See DEIS, Table 3-2 at p. 3-10. Similarly, it appears that the allocations proposed for each Use Area in Appendix A assume the same length of seasons for all Use Areas; the only difference being the number of GAOT permitted.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

11 / 32

What basis does the Forest Service have for assuming that the length of the spring season is 42 days for all Use Areas? The 1998 RCCA provided a range of days for the spring season per Use Area from 16 to 40 days. How does estimating capacity based on a 42 day season for all Use Areas in the spring reflect consideration of the practical maximum capacity referred to in the ROS Users Guide? Is the difference between "practical maximum" and "optimal" capacity simply that the former recognizes that different local patterns of use apply to different Use Areas depending upon the time of year, distance from communities, and intended recreational activities? Does calculating carrying capacity for the Chatham Area without accounting for factors which are always present and significantly affect recreation use patterns result in an inflated and arbitrary carrying capacity calculation? Has the Forest Service considered all the relevant factors in determining recreation carrying capacity if it didn't (or can't) calculate the local pattern of recreational use per Use Area each season?

5. Why didn't the RCCA consider recreational opportunities on private or state selected lands?

It is apparent from reading the 2001 RCCA and DEIS that the Forest Service never considered recreational opportunities on private lands within the analysis area. According to the ROS User Guide (at p.15), an inventory of recreation opportunities on private lands adjacent to national forest lands is appropriate to determine the effect of such opportunities (or lack thereof) on the kinds of recreational opportunities available on national forest lands. Following this reasoning, the Forest Service should also consider recreational opportunities on adjacent state land selections. We request the Forest Service to explain how and to what degree private land (or state land) development has influenced or is expected to influence the proposed large-group allocations considered in this DEIS.

D. Concerns With Implementing The Proposed Management Framework.

1. Monitoring

The monitoring program proposed in Appendix D relies primarily on self-reporting from outfitter/guides and anecdotal reports from the public and Forest Service personnel. How often are outfitter/guides required to submit actual use reports? Are these use reports sufficiently formalized to provide the Forest Service with scientifically verifiable data regarding the effects of the permitted activities on forest resources, and the effectiveness of best management practices at mitigating effects?

The proposed monitoring program may be adequate to compare actual commercial use levels with the levels permitted. However, the monitoring program fails to address a critical issue acknowledged in the DEIS: the difficulty in quantifying the amount of unguided use occurring within the analysis area and the effects of permitted use on that use. See DEIS at 3-17. The Forest Service needs to identify the steps it can take to develop reliable data on unguided use in the analysis area.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

12 / 32

Appendix G—Response to Comments

4. Problem with postponing analysis

Although the DEIS identifies 'hotspots' where there are existing perceptions of overcrowding and the possibility of reductions in unguided recreation use if total carrying capacity is neared or reach, no explanation is provided about how these problems will be addressed when or if they arise. Simply using the agency's Special Use permitting authority isn't sufficient because it will not involve the public. The management framework adopted by agency should clarify exactly when and how such additional analysis will be conducted.

It is necessary for the agency to consider how it will respond to these situations now because of the reasonable response of outfitters and guides to a lifting of the existing moratorium. When the Forest Service lifts the moratorium, it is reasonable to expect that commercial outfitters and guides will try to record as many landings in various Use Areas as possible in the interest of self-preservation. The DEIS (at p. 1-5) plainly acknowledges the possibility of limiting commercial uses in the future but fails to articulate the precise method for allocating a limited number of permits.

III. COMMENTS ON SPECIFIC LARGE GROUP AREAS

The following comments raise specific issues regarding each Large Group Area proposed in this DEIS.

A. Enclaves

Use Area	01-01
Name	Katzehin Falls
LUD	Semi-remote Recreation
ROS	Roaded Natural

This area is identified in TLMP as an inventoried Recreation place important to tourism. This area is also an important area for subsistence hunting and recreation for residents of Haines.

We disagree with the Roaded Natural ROS class identified for this area. According to TLMP (Appendix E at E-79), "the entire drainage is unroaded, undeveloped" Consequently, this area reasonably meets the physical and social attributes for the Primitive ROS setting.

While the mouth of this river (including the proposed enclave site) is part of the potential road corridor from Juneau to Skagway, the management prescriptions for the Transportation and Utility System LUD specifically direct the Forest Service to provide recreation settings consistent with the initial LUD (Semi-remote Recreation in this case) prior to construction of the road. See TLMP at p. 3-162. The DEIS does not propose any facility development at this site. See OIG DEIS at B-6. Consequently, it is inappropriate under TLMP to designate this area as an Enclave or a Fifteen Percent area.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

14/32

This is particularly important with regard to subsistence use by rural residents within the analysis area. The Alaska Department of Fish and Game has ranked the sensitivity of VCUUs on the Tongass used for subsistence hunting, fishing and plant gathering from disturbance.⁵ Neither the discussion in the DEIS nor 2001 RCCA, however, considers the effect from substantially increasing the amount of visitor use in the analysis area on those subsistence activities. For example, the entire western shore of Tenakee Inlet is identified by ADF&G as having the highest sensitivity to disturbance, as was Poison Cove and Uskh Bay near Sitka. Several Large Group Areas are proposed in Tenakee Inlet, as well as ones in Poison Cove and Uskh Bay. What is the effect of substantially increasing the level of commercial recreation use on subsistence uses in these highly sensitive areas?

2. Adequacy of Proposed Mitigation Measures

Absent for the DEIS is any discussion of the effectiveness of existing or proposed mitigation measures or monitoring information to support the assumption that these measures have been effective. The list of proposed mitigation measures also fails to include any specific measures for mitigating the potential introduction of non-native plant species. According to the DEIS (at p. 3-93), "Noxious weeds would have a higher potential of developing in and around areas containing estuarine and uplifted beach meadows with high levels of recreation use." The Forest Service considers vegetation in these areas the "most vulnerable" because "These areas would potentially have more recreation use, which increases the potential of exposed or disturbed soil and the introduction of weed seeds." *Id.* This needs to be addressed because of the number of Large Group Areas proposed for areas with upper estuarine meadows and uplifted beach meadows. Additionally, the DEIS fails to address the cumulative effects associated with the introduction of noxious weeds, such as the effects on the human environment from use of herbicides or pesticides to control such infestations.⁶

Another mitigation measure that the Forest Service should consider is temporal restrictions in areas where the DEIS proposes to authorize large and frequent shore parties. One way of doing this would be to identify certain days of the week, month, or season when large commercial shore parties would not be authorized.

3. Re-evaluating management framework

We could not find anywhere in the DEIS a provision requiring the Forest Service to re-evaluate carrying capacities on a regular basis. One approach the Forest Service should consider is to bring users together periodically (every two seasons at a maximum) to examine the results of monitoring the effects of its decisions to allocate shoreline carrying capacities.

⁵ See ADF&G, *Tongass Fish and Wildlife Resource Assessment* (1998).

⁶ See e.g., Decision Notice and FONSI on the Eradication of Japanese Knotweed at Deep Cove (Aug. 22, 2002).

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

13/32

Response to Comments—Appendix G

Primitive ROS. Consequently, it would be inappropriate under TLMP to designate this site as a Fifteen Percent area. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	01-04B
Name	Shelter Island
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. Given the high local use of this area for recreation, this area should not be designated a Large Group Area. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	01-04C
Name	Sunny Cove
LUD	Semi-remote Recreation
ROS	Roaded Natural

Unlike Use Area 01-03 (Cant Cove), this area could be considered for designation as an enclave because of its Roaded Natural ROS.

Use Area	01-05B
Name	Mallard Cove
LUD	Modified Landscape
ROS	Roaded Natural / Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. Like Sunny Cove (Use Area 01-04C), this area could be considered for designation as an enclave consistent with TLMP.

Use Area	01-05B
Name	No Name Cove
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the same reasons discussed above for Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	01-05B
Name	Point Anmer
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

16 / 32

Use Area	01-02
Name	Sullivan Mountain
LUD	Modified Landscape
ROS	Semi-primitive Motorized, Semi-primitive Non-motorized

This area is identified in TLMP as an inventoried Recreation place. Our members in Haines use this area for subsistence hunting and recreation. TLMP directs the Forest Service to seek to maintain the existing ROS settings, particularly Semi-primitive Non-motorized settings, when feasible for this LUD. Therefore, this area is inappropriate as an Enclave. It is impossible to tell from the DEIS to what extent this proposed Large Group Area is located within the Semi-primitive Non-motorized ROS at this site. Consequently, designation as a Fifteen Percent area may also be inconsistent with TLMP.

Use Area	01-03
Name	Cant Cove
LUD	Semi-remote Recreation
ROS	Semi-remote Motorized

This area is identified in TLMP as an inventoried Recreation place. As noted above (ILB-4), the most reasonable interpretation of TLMP is that designation of enclaves in a Semi-remote Recreation LUD is inappropriate if the ROS class is the same or less developed than the Semi-primitive Motorized ROS setting. It may be appropriate to designate this area as a Fifteen Percent area, if physical site conditions can tolerate this level of use and local recreational and subsistence use is unaffected.

Use Area	01-03
Name	Homeshore
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. Under the management prescriptions for the Scenic Viewshed LUD, TLMP directs the Forest Service to seek to maintain existing ROS class. Consequently, this area could be designated a Fifteen-Percent area but not an Enclave.

Use Area	01-03
Name	Howard Bay
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the same reasons discussed above relating to Use Area 01-03 (Cant Cove), it is inappropriate to designate this area as an Enclave. The area is completely undeveloped and therefore use by high clearance vehicles is definitely uncommon. Therefore, this site reasonably meets the physical and social setting requirements for classification as a

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

15 / 32

Appendix G—Response to Comments

In addition, given the noted difficulties with access (poor anchorage due to exposure), why does the Forest Service presume that it will (or could) be used every day in the season for purposes of setting the "optimal" capacity for this site?

Use Area	01-05C
Name	Port Houghton
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

This SEACC Special Area is an inventoried Recreation place, but TLMP did not identify it as important to tourism. Consequently, this portion of Port Houghton clearly qualifies as an "infrequently-traveled marine travelway." According to the supplemental DEIS issued in May 2002 to determine the wilderness eligibility of Tongass roadless areas, this area provides primarily primitive and semi-primitive recreation opportunities and contains "vast opportunities for solitude and primitive recreation." SDEIS, Appendix C1 at p.C1-593, 594. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. For all these reasons, this portion of Port Houghton reasonably meets the physical and social setting requirements for a Primitive ROS setting. Because TLMP directs the Forest Service to seek to maintain the existing ROS class for this LUD until approved activities are authorized, this site should not be designated an Enclave or Fifteen Percent area. Any commercial recreation activity permitted in area should be limited to non-motorized types of activities.

Use Area	01-05C
Name	Sand Bay
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

TLMP identifies this area as an inventoried Recreation place important to tourism. Under the management prescriptions for the Scenic Viewshed LUD, TLMP directs the Forest Service to seek to maintain existing ROS class. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	04-03
Name	Dry Pass
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. Like Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

18 / 32

This area is identified in TLMP as an inventoried Recreation place important for tourism. Under the management prescriptions for the Scenic Viewshed LUD, TLMP directs the Forest Service to seek to maintain existing ROS class. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	01-05B
Name	West Gilbert Bay
LUD	Timber Production
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. Under TLMP, the Forest Service is required to manage for existing ROS until approved activities change ROS settings. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area	01-05C
Name	Fanshaw
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

TLMP identifies this area as an inventoried Recreation place. Under the management prescriptions for the Scenic Viewshed LUD, TLMP directs the Forest Service to seek to maintain the existing ROS class. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities. Note: According to the DNR's Central/Southern Southeast Area Plan (2000), the adjacent state land selection is a black bear spring concentration area. That plan limits authorized uses to dispersed recreation use and calls for inclusion of the area into the state marine park system.

Use Area	01-05C
Name	North Windham Bay
LUD	Scenic Viewshed
ROS	Semi-primitive Motorized

TLMP identifies this area as an inventoried Recreation place important for tourism. Under the management prescriptions for the Scenic Viewshed LUD, TLMP directs the Forest Service to seek to maintain existing ROS class. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

17 / 32

Response to Comments—Appendix G

Use Area 04-03
Name Eagle River Road
LUD Semi-remote Recreation, Timber Production
ROS Modified Road, Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. Designating this popular local use area an Enclave is consistent with TLMP but may increase conflicts between commercial users and local, unguided users.

Use Area 04-03
Name Noxon
LUD Semi-remote Recreation
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place important for tourism. Designating this area an Enclave is consistent with TLMP.

Use Area 04-04A
Name Lake Eva Trail
LUD Semi-remote Recreation
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. Like Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-04A
Name Point Elizabeth
LUD Timber Production
ROS Roaded Modified

TLMP did not identify this area as an inventoried Recreation area. Designating this area an Enclave is consistent with TLMP.

Use Area 04-04A
Name Rodman Bay
LUD Timber Production
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place important for tourism. Given the impacts from previous logging, this is precisely the type of area that should be targeted for more concentrated recreation and tourism development. Designating this area an Enclave is consistent with TLMP.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

19 / 32

Use Area 04-04A
Name Saook Bay
LUD Timber Production
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Unlike Use Area 04-04A, this area looks pretty darn pristine today even though it was subjected to earlier logging development. Given its current condition, and the fact that the old logging road is overgrown and not susceptible to high vehicle clearance, this site reasonably meets the physical and social settings attributable to a Semi-primitive Motorized ROS. Like Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-04B
Name Hanus Bay
LUD Scenic Viewshed
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Designating this area an Enclave is consistent with TLMP.

Use Area 04-04B
Name Kelp Bay Middle Arm
LUD Semi-remote Recreation
ROS Primitive

This area is identified in TLMP as an inventoried Recreation place. For the reasons identified for Use Area 01-03 (Cant Cove), an Enclave is inappropriate here. In addition, given the Primitive ROS class for this area, designating the area as a Fifteen-Percent area is also inappropriate because TLMP limits group sizes generally to 12 people for this ROS. See TLMP at p. 4-46. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-04B
Name Portage Arm
LUD Modified Landscape, Scenic Viewshed, Timber Production
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-08
Name Cordwood Creek
LUD Semi-remote Recreation
ROS Semi-primitive motorized

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

20 / 32

Appendix G—Response to Comments

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the reasons identified for Use Area 01-03 (Cant Cove), Cordwood Creek could be designated a Fifteen-Percent area but not an Enclave given its ROS class. However, given the lack of any motorized trail or road at this location or known use by high clearance vehicles, this Use Area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, designation of this creek as a Large Group Area is inconsistent with TLMP. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-08
Name Fowler Creek
LUD Semi-Remote Recreation
ROS Roaded Natural

This area is identified in TLMP as an inventoried Recreation place important for tourism. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-11
Name Eight-Fathom Dock Area
LUD Scenic Viewshed
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place important for tourism. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-11
Name Kennel Creek
LUD Scenic Viewshed
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-11
Name Red Cliff Islands
LUD Semi-remote Recreation
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. For the reasons identified for Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-11
Name Salt Lake Bay Dock

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

21 / 32

LUD Scenic Viewshed
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-12
Name Corner Bay Road
LUD Scenic Viewshed, Timber Production
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Like Rodman Bay (Use Area 04-04A), this area is a good site for an Enclave because it has a dock and is already a "hardened" site. Any commercial recreation activity permitted in this area should prohibit motorized types of activities on the road west of this site.

Use Area 04-12
Name Crab Bay
LUD Timber Production
ROS Semi-primitive Motorized / Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. It is also an important local use area and large groups could easily conflict with local subsistence and recreation users. According to the 2002 draft supplement to TLMP, this entire drainage is currently roadless and therefore use by high clearance vehicles is uncommon. Therefore, Crab Bay reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, designation of this site as an Enclave or Fifteen Percent area is inconsistent with TLMP.

Use Area 04-12
Name West Tenakee (Goose Flats)
LUD Modified Landscape
ROS Semi-primitive Motorized

This SEACC Special Area is currently pristine and undeveloped. Goose Flats is an inventoried Recreation place. It is also an important local use area and large groups could easily conflict with local subsistence and recreation users. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Therefore, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Consequently, designation of Goose Flats as an Enclave or a Fifteen Percent area is inconsistent with TLMP.

Use Area 04-13
Name Poison Cove
LUD Scenic Viewshed

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

22 / 32

ROS Road Modified

This SEACC Special Area is identified in TLMP as an inventoried Recreation place. It is also an important local use area and large groups could easily conflict with local subsistence and recreation users. According to the 2002 draft supplement to TLMP, this entire drainage is currently roadless. Therefore, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Given this ROS, it is inconsistent with TLMP to designate this area as an Enclave or a Fifteen Percent Area.

Use Area 04-13	
Name	Sitkoh Bay Road
LUD	Modified Landscape
ROS	Road Modified

This area is identified in TLMP as an inventoried Recreation place. Designating this area an Enclave could be consistent with TLMP.

Use Area 04-13	
Name	Ushk Bay
LUD	Modified Landscape / Timber Production
ROS	Road Modified

TLMP identified this SEACC Special Area as an inventoried Recreation place important for tourism and roadless. It is also an important local use area and large groups could easily conflict with local subsistence and recreation users.

According to the Ushk Bay Final EIS (Nov. 1994),⁷ "ROS classes contained in the Project Area include three of the five defined by the ROS: Primitive, Semi-primitive Non-motorized, and Semi-primitive Motorized. ... Recreation opportunities are largely primitive because access is limited to boat or float plane. ... Other than a short timber harvest access road at the head of Ushk Bay that is densely overgrown with alder, there are no roads in the area." Ushk Bay FEIS at p. 3-47 (emphasis added). Because use of high clearance vehicles does not occur here, this area meets the physical and social setting requirements for the Primitive ROS classification. Consequently, this area is inappropriate as an Enclave or Fifteen Percent area. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-15	
Name	Bohemia Basin
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. It is also an important local use area for residents of Pelican and large groups could easily conflict with local subsistence and recreation users. For the reasons identified for Use

⁷ For the record, the logging approved in this area under the Ushk Bay FEIS never occurred. SEACC's Comments on the Shoreline Outfitter/Guide DEIS January 3, 2003

23 / 32

Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. Any commercial recreation activity permitted in this area should be limited to non-motorized types of activities.

Use Area 04-15	
Name	Three Hill Island
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the reasons identified for Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

Use Area 04-16D	
Name	George Island
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the reasons identified for Use Area 01-03 (Cant Cove), it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

FIFTEEN-PERCENT AREAS

Use Area 01-04B	
Name	Douglas Island
LUD	Scenic Viewshed
ROS	Roaded Natural

This area is identified in TLMP as an inventoried Recreation place important for tourism. According to the 2002 draft supplement to TLMP, this entire area is currently roadless. Therefore, the Forest Service lacks a reasonable basis for classifying this site as a having a Road Modified ROS. Consequently, it may be appropriate to designate this area as a Fifteen-Percent area but not an Enclave.

Use Area 01-05B	
Name	Point Coke
LUD	Old-growth
ROS	Semi-primitive Motorized

SEACC's Comments on the Shoreline Outfitter/Guide DEIS January 3, 2003

24 / 32

Appendix G—Response to Comments

While designating this area a Fifteen-Percent area could be consistent with TLMP, the maximum number of users per day allowed in TLMP for the Old-growth Habitat LUD and LUD IIs is 50. See TLMP at 4-40. Although the Forest Service may authorize numbers larger than this in this LUD, site-specific analysis is required. This DEIS fails to provide sufficient site-specific analysis to justify a group size of 50, let alone expanding that number to 75 people. We recommend that any commercial recreation activity permitted in this Large Group Area be limited to non-motorized types of activities.

Use Area	04-03
Name	Fish Bay
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the reasons noted above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

Use Area	04-03
Name	Nadezhda Islands
LUD	Semi-remote Recreation
ROS	Semi-primitive Motorized

Designating this area a Fifteen Percent area is consistent with TLMP. We recommend that any commercial recreation activity permitted in this Large Group Area be limited to non-motorized types of activities.

Use Area	04-04A
Name	Duffield
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized

For the reasons noted above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

Use Area	04-04B
Name	Bourbon Creek Road
LUD	Modified Landscape
ROS	Roaded Modified, Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. Designating this area a Fifteen Percent area could be consistent with TLMP.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

25 / 32

Use Area	04-04B
Name	Cosmos Cove
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. For the reasons noted above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

Use Area	04-11
Name	Iyookeen Peninsula
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. For the reasons stated above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities.

Use Area	04-11
Name	Neka Bay North Bight
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized, Semi-primitive Non-Motorized, and Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. For the reasons noted above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities because of local subsistence use.

Use Area	04-11
Name	Neka Bay South Bight
LUD	Old-growth Habitat
ROS	Semi-primitive Motorized, Semi-primitive Non-Motorized, and Roaded Modified

This area is identified in TLMP as an inventoried Recreation place important for tourism. For the reasons noted above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this area be limited to non-motorized types of activities because of local subsistence use.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

26 / 32

Response to Comments—Appendix G

Use Area 04-12
Name Salsary Bay
LUD Old-growth Habitat, Modified Landscape
ROS Semi-primitive Motorized

This SEACC Special Area is identified in TLMP as an inventoried Recreation place important for tourism. It is an important local use area and large groups could easily conflict with local subsistence and recreation users. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Even if Tenakee Inlet is considered a 'frequently traveled marine travel way, once one leaves the immediate shoreline you are out of sight and sound of the inlet. Therefore, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Consequently, Salsary Bay should not be designated a Fifteen Percent area. We recommend that any commercial recreation activity permitted here be limited to non-motorized types of activities.

Use Area 04-12
Name Seal Bay
LUD Old-growth Habitat
ROS Roaded Modified, Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. A portion of this site is given the Roaded Modified ROS because of an old skid trail. Currently, however, this skid trail is completely overgrown, unrecognizable as a road, and there is no evidence of common use by high clearance vehicles. It is also an important local use area and large groups could easily conflict with local subsistence and recreation users. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Therefore, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, it is also inappropriate to designate this site as a Fifteen Percent area. Regardless of the ROS, for the reasons noted above (Use Area 01-05B, Point Coke), Seal Bay should not be designated a Fifteen Percent area. We recommend that any commercial recreation activity permitted here be limited to non-motorized types of activities.

Use Area 04-12
Name Trap Bay
LUD LUD II
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. Unlike Patterson Bay, ^{supra}, which has a Primitive ROS, no commercial logging has ever occurred in this watershed. Even if Tenakee Inlet is considered a 'frequently traveled marine travel way, once one leaves the immediate shoreline you are out of sight and sound of the inlet. In addition, the U.S. House of Representatives concluded in 1989 that this pristine area

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

27 / 32

qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Therefore, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Trap Bay is also an important local use area and large groups could easily conflict with local subsistence and recreation users. For all these reasons, Trap Bay should not be designated as a Fifteen Percent area. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

Use Area 04-13
Name Moser
LUD LUD II
ROS Primitive

According to TLMP (at p. 4-41), the Forest Service should generally limit a party size to no more than 12 persons for any one site or activity group within a Primitive ROS setting. Consequently, designating this Use Area as a Fifteen Percent area with large groups up to 75 people once a week is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

Use Area 04-13
Name Nelson Falls
LUD LUD II
ROS Primitive

The Forest Service should generally limit a party size to no more than 12 persons for any one site or activity group within a Primitive ROS setting. Consequently, designating this Use Area as a Fifteen Percent area with large groups up to 75 people once a week is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

Use Area 04-13
Name Nismeni Point
LUD Old-growth Habitat
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. For the reasons above (Use Area 01-05B, Point Coke), it is inappropriate to designate this area as a Fifteen Percent area. We recommend that any commercial recreation activity permitted here be limited to non-motorized types of activities.

Use Area 04-13
Name Patterson Bay
LUD LUD II
ROS Primitive

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

28 / 32

Appendix G—Response to Comments

This area is identified in TLMP as an inventoried Recreation place. The Forest Service should generally limit a party size to no more than 12 persons for any one site or activity group within a Primitive ROS setting. Consequently, designating this Use Area as a Fifteen Percent area with large groups up to 75 people once a week is inconsistent with TLMP. Note: From the map in the DEIS (p.B-119), it is unclear if the Forest Service intends for there to be three (3) Fifteen Percent areas on the south shore of this bay or the map simply identifies 3 possible anchorages for one Fifteen Percent area. Irregardless, designation of Patterson Bay as a Fifteen Percent area and allowing single parties of up to 75 people once a week is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be limited to non-motorized types of activities.

Use Area 04-13
Name Patterson Bay North Point
LUD LUD II
ROS Primitive

This area is identified in TLMP as an inventoried Recreation place. The Forest Service should generally limit a party size to no more than 12 persons for any one site or activity group within a Primitive ROS setting. Consequently, designating this Use Area as a Fifteen Percent area with large groups up to 75 people once a week is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be limited to non-motorized types of activities.

Use Area 04-13
Name Todd Road/Lindenberg Head
LUD Scenic Viewshed
ROS Roaded Modified

This area is identified in TLMP as an inventoried Recreation place. Consistent with TLMP, this area could be designated either a Fifteen Percent area or an Enclave.

Use Area 04-16A
Name Damp Marker
LUD LUD II
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Consequently, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, it is also inappropriate to designate this site as a Fifteen Percent area. Irregardless of the ROS, however, designation of Damp Marker as a Fifteen Percent area for groups of up to 75 people is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

29/32

Use Area 04-16A
Name Pinta Cove
LUD LUD II
ROS Semi-primitive Motorized

In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Consequently, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, it is inappropriate to designate this site as a Fifteen Percent area. Irregardless of the ROS, however, designation of Pinta Cove as a Fifteen Percent area for groups of up to 75 people is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

Use Area 04-16C
Name Big Shaw Island
LUD LUD II
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place important for tourism. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Consequently, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, it is inappropriate to designate this site as a Fifteen Percent area. Irregardless of the ROS, however, designation of Big Shaw Island as a Fifteen Percent area for groups of up to 75 people is inconsistent with TLMP. We recommend that any commercial recreation activity permitted in this LUD II be specifically limited to non-motorized types of activities.

Use Area 04-16C
Name Fox Creek
LUD LUD II
ROS Semi-primitive Motorized

This area is identified in TLMP as an inventoried Recreation place. In 1989, the U.S. House of Representatives concluded that this pristine area qualified for designation as Wilderness in the House-passed version of the Tongass Timber Reform Act. Consequently, this area reasonably meets the physical and social setting requirements for a Primitive ROS setting. Therefore, it is also inappropriate to designate this site as a Fifteen Percent area. Irregardless of the ROS, however, designation of Fox Creek as a Fifteen Percent area for groups of up to 75 people is inconsistent with TLMP.

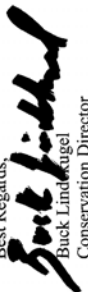
SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

30/32

Response to Comments—Appendix G

We appreciate the opportunity to review and comment on the DEIS and look forward to the Forest Service taking corrective action on the deficiencies we have identified and changes requested.

Best Regards,


Buck Lindenberg
Conservation Director



Lynn Canal Conservation, Inc.
P.O. Box 964 • Haines, Alaska 99827-0964

US Forest Service
Attn. Mary Beth Nelson
Shoreline Outfitter Guide Project
Haines AK 99827

Dear Mary Beth:

December 26, 2002

Lynn Canal Conservation will make specific recommendations in our comments regarding the Katzebin and Sullivan Mountain areas, and generally address two major issues of concern: ensuring resource protection, and equitable distribution of use between commercial and non-commercial users.

The Forest Service has undertaken a very ambitious project in attempting to analyze the seven million acres of shoreline area from Skagway to Port Alexander. The alternatives presented would increase commercial use from 1999 levels (2410 group days) by a minimum of 250% (Alternative 4 – 6,192 group days) up to a maximum of 1,690% (Alternatives 1 and 3 – 40,658 group days). These percentages actually underrepresent potential increases because the average commercial group size in 1999 was 6 people, but group size may be allowed to increase to up to 75 people. As a consequence, there is really no way of comparing projected use with actual use levels of 1999 and no way of understanding how these huge increases in human use will impact public resources. For example, Gran Point Sealar sea lion haulout is located within one mile of a proposed enclave at Katzebin Falls. There is no analysis of impacts from increased visitation of this critical habitat area. This is just one example of the lack of analysis of human impacts to wildlife and habitat in this planning document.

Further, huge increases in allowed levels of commercial use in **all** alternatives goes completely counter to public sentiment expressed during the scoping process: “**Most respondents** felt that the quality of the recreation experience needs to be maintained and that commercial use needs to be controlled.” (DEIS at 1-22, emphasis added). We would argue that increases from 250 to 1,690% or more do not allow the levels of control requested by “most respondents.”

We believe that no planning (Alternative 1) is a much better approach than reckless planning (all other alternatives)—planning that does not even identify, much less analyze, many of the resources that should be protected. This is not to say, however, that we support Alternative 1 either, because we believe that a true No Action alternative would be one that freezes the allowed use to current levels, and as a result of this freezing, no

31/32

SEACC's Comments on the
Shoreline Outfitter/Guide DEIS
January 3, 2003

Shoreline O/G EIS
2.0-0074
12/26/02

lcc11@alaska.net • <http://seaknet.alaska.edu/~lcc11>

 100%
Encouraging Environmental Awareness in the Upper Lynn Canal

1/4

Appendix G—Response to Comments

DEIS as “some expressed a desire for ‘commercial-free zones’.” (DEIS at 1-22)—it is apparently easier to dismiss “some” concerns than a “large number” of concerns.

By creating commercial free zones in highly valued, popular local areas, the Forest Service can fulfill its obligation to minimize “adverse impacts to popular or highly-valued local areas with outfitter guide operations.” (Forest Plan at 4-41). This could be accomplished quite easily by “the development of alternatives which allocate 0% of the total carrying capacity to commercial guides in some areas.” (SEACC 1/28/99). LCC fully supports the concept of commercial free areas to provide the needed balance between commercial and non-commercial use, to reduce conflicts between commercial and non-commercial user groups, and to protect valued local use areas.

It is critical for the Forest Service to take the concerns of local residents to heart because the region’s economy is tied to these concerns: “A significant portion of the region’s economic base is tied not to the local production of goods and services but to the choice of individuals to continue to live in small communities that are found in the analysis area. In Southeast Alaska, access to the natural environment and the range of subsistence and recreation activities this access entails, is a central element in the choice of individuals to remain in the region. Consequently, the breadth and quality of recreation opportunities for local residents may be as important in generating incomes in the analysis area as are commercial tourism and recreation operations catering to visitors. This needs to be considered when balancing commercial and non-commercial recreation access on the national forest.” (DEIS at 3-63).

Specific Area Requests

As per our 2/16/00 scoping comments, LCC requests the southern end of Sullivan Island and the Katzechin Flats be designated as commercial-free areas (with the exception of existing commercial use by hunting guides on the Katzechin Flats). Both are important local use areas for subsistence hunting and recreation.

We strongly object to Alternatives 3 and 5 which designate Katzechin Falls and Sullivan Mountain as enclaves. We believe the close proximity of the Gran Point Stellar Sea Lion haulout should preclude an enclave at Katzechin Falls. We believe no exceptions should be created to the Forest Plan to allow more visitation than existing ROS guidelines: a maximum group size of 20 in Semi-Primitive ROS areas and a maximum of 12 people in Primitive ROS areas.

We cannot support any of the proposed alternatives because we believe the Forest Service did not present a broad range of alternatives as required by NEPA, including a legitimate No Action alternative. We would support an alternative that delineates commercial-free areas for each community in the planning area, that allows no use greater than outlined by the Forest Plan ROS guidelines, and that provides for a modest level of increase over current commercial use levels (up to 5% per year to be reevaluated in 5 years).

Sincerely,

Scott Carey

PRESIDENT LYM CANAL CONSERVATION

3/4

additional resource impacts would occur. To have a No Action alternative which would allow human use to increase by 1,690% or more, borders on ridiculous. We recommend acting in accordance with the Forest Plan which states the Forest Service must consider whether “the affected ecosystems have the capability to accommodate the expected kinds of activities and amounts of use without degradation of ecosystem composition and structure.” (Forest Plan at 4-41). An honest assessment of the Forest Service’s ability to determine ecosystem degradation for wildlife and wildlife habitat occurs in the DEIS: “Wildlife population dynamics and habitat relationships are not completely understood.” (DEIS at 3-4). Opening up 7 million acres to exponentially increasing levels of human use with incomplete understanding of potential resource impacts opens up huge areas to potential degradation. We believe the Forest Service needs to slow down and do its homework before considering increasing commercial use exponentially.

NEPA requires an EIS include a No Action alternative. As stated, we believe that a true No Action alternative would maintain existing levels of commercial use with no allowed increases. The DEIS states: “there is substantial room for industry growth beyond current (1999) use levels in all alternatives.” (DEIS at 3-36, emphasis added). This means that the existing range of alternatives does not take into consideration the many people who commented that there is already too much commercial use: “Many people commented that the existing or increasing level of commercial use is causing crowding or displacement of local residents and independent travelers who recreate on the national forest. As community recreation has grown, many local residents are feeling displaced or crowded in their local areas and in remote areas where they expect primitive experiences.” (DEIS at 1-21, emphasis added). Consequently, we request a true no action alternative that holds the line at 1999 levels be evaluated. We also request additional alternatives be considered which allow for less than 1999 levels so that concerns expressed in scoping by “many people” can be addressed, analyzed, and compared to other alternatives—the point of the NEPA process.

The DEIS acknowledges the importance of recreational opportunities to the Southeast lifestyle: “Alaska residents place a high value on the quality and availability of outdoor recreation opportunities, and ready access to these plentiful recreation opportunities is a strong quality of life component.” (DEIS at 3-16 and 17). It is a stated goal for the Forest Service to provide “quality recreation experiences sought by both guided and unguided users.” (DEIS at 3-6). The Forest Service acknowledges that residents and non-residents have different expectations concerning solitude and crowding. (DEIS at 3-16 to 17). Therefore it only seems logical that the Forest Service make an attempt to separate these two user groups—at least in some parts of the planning area. The stated purpose to “balance commercial and non-commercial recreation opportunities and reduce the potential for user conflict” (DEIS at ii) can only be achieved by designating portions of the planning area as commercial free. In fact, the Forest Service scoping process revealed that “a large number of comments requested commercial free zones.” (2/8/00 Summary, emphasis added). It is disingenuous for the Forest Service to not include an alternative which would achieve its stated goal and purpose and which was favored in a “large number” of scoping comments. Unfortunately, this information translated into the

2/4